



## Neath Port Talbot Replacement Local Development

### Plan Review

# Integrated Sustainability Appraisal Scoping Report

September 2023

On behalf of **Neath Port Talbot Council**



Cyngor Castell-nedd Port Talbot  
Neath Port Talbot Council

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**Table 1.1: List of Abbreviations**

Abbreviation	Meaning
AMR	Annual Monitoring Report
DPM	Development Plans Manuals
EqIA	Equalities Impact Assessment
EIA	Environmental Impact Assessment
ER	Environmental Report
EU	European Union
HIA	Health Impact Assessment
HRA	Habitats Regulations Assessment
ISA	Integrated Sustainability Appraisal
LDP	Local Development Plan
LPA	Local Planning Authority
LSE	Likely significant effect
NGA	National Growth Area
NNR	National Nature Reserve
NPCBC	Neath Port Talbot County Borough Council'

Abbreviation	Meaning
NPTC	Neath Port Talbot Council
NRW	Natural Resources Wales
NPTPSB	NPT Public Service Board
PCPA	Planning and Compulsory Purchase Act
PPW	Planning Policy Wales
PWA	The Planning (Wales) Act
REN	Resilient ecological networks
RGA	Regional Growth Areas
RLDP	Replacement Local Development Plan
RR	Risk Register
SA	Sustainability Appraisal
SAC	Special Areas of Conservation
SBCD	Swansea Bay City Deal
SEA	Strategic Environmental Assessment
SDP	Strategic Development Plan
SoNaRR	Second State of Natural Resources Report

<b>Abbreviation</b>	<b>Meaning</b>
SPA	Special Protection Area
SPG	Supplementary Planning Guidance
SSA	Strategic Search Areas
SSSI	Sites of Special Scientific Interest
TAN	Technical advice notes
WBFGA	Wellbeing of Future Generations (Wales) Act
WG	Welsh Government

# 1 Introduction

## 1.1. Background

- 1.1.1. Stantec UK has been commissioned by Neath Port Talbot Council (NPTC) to undertake an Integrated Sustainability Appraisal (ISA) of the NPT Local Development Plan (LDP) Review and the emerging NPT Replacement LDP (RLDP) ('the emerging RLDP').
- 1.1.2. This report is the first stage of an ISA process to identify, assess and address in an integrated manner any likely significant effects on the environment (including European Sites), sustainability, health and equalities of undertaking the NPT LDP Review (resulting in the preparation of the RLDP). The report outlines the proposed approach to undertaking the ISA process, incorporating a suite of statutory and non-statutory assessment processes:
- **Sustainability Appraisal (SA)** as required under the Planning and Compulsory Purchase Act 2004 ('the 2004 Act') and the Development Planning (Wales) Regulations 2005 ('the 2005 Regulations');
  - **Strategic Environmental Assessment (SEA)** as required by the Environmental Assessment of Plans and Programmes (Wales) Regulations 2004 ('the SEA Regulations');
  - Supporting the implementation of **wellbeing goals and wellbeing objectives** (and the discharge of associated duties) as required under **the Wellbeing of Future Generations (Wales) Act (WBFGA) 2015**. The preparation of the RLDP needs to consider social, economic, environmental and cultural well-being;
  - **Equalities Impact Assessment (EqIA)** under the Equality Act 2010 – covering the Public Sector Equality Duty and the Socio-economic Duty;
  - **Health Impact Assessment (HIA)** – non-statutory but needed to support robust SEA, EqIA and wellbeing assessment processes; and,

- **Welsh Language Impact Assessment** as required under the 2004 Act, the Welsh Language Standards (No.1) Regulations 2015 and PPW 11<sup>th</sup> Edition.

## 1.2. Purpose and Objectives

1.2.1. The purpose of this ISA process is to identify, assess and, where appropriate, address the likely significant effects from the NPT LDP Review ('the LDP Review) on the environment (including European Sites), health, equalities issues, wellbeing and the use of the Welsh language. The ISA should be viewed as a key plan making tool and it will be used throughout the LDP Review to inform the preparation of the RLDP in order to maximise its effectiveness, rather than simply providing retrospective reporting of likely impacts.

1.2.2. The dual purpose of this report is to:

- Seek the views of the SEA Consultation Bodies<sup>1</sup> and other relevant consultees on the proposed methodology and assessment framework for undertaking a robust and legally compliant ISA of the NPT LDP Review in accordance with relevant statutory requirements; and in doing so; and,
- Seek the views of the SEA Consultation Authorities on a draft SEA screening determination to satisfy procedural requirements and to confirm that a SEA needs to be incorporated within the SA.

1.2.3. This version of the ISA Scoping Report will be updated post consultation to address pertinent matters raised by consultees.

## 1.3. Overview of the NPT LDP Review

1.3.1. NPTC is the unitary authority responsible for local government across a 442km<sup>2</sup> area of South Wales, as shown in **Figure 1.1** NPTC is located within the South West Wales Region (as identified within Future Wales 2040: The National Development Plan' framework (Future Wales) and Strategic Development Plan area. This includes the LA areas of Carmarthenshire,

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<sup>1</sup> The SEA Consultation Bodies are defined by the SEA Regulations as Cadw and Natural Resources Wales (NRW). The WG will also be treated as a SEA Consultation Body for the purposes of this ISA.

Pembrokeshire, Swansea and NPT. The neighbouring authorities are Swansea, Bridgend, Rhondda Cynon Taff, Powys and Carmarthenshire.

1.3.2. NPTC is also part of the Swansea Bay City Deal, a £1.3bn investment secured by the Swansea Bay City Region for 11 major projects across Pembrokeshire, Carmarthenshire, Swansea and NPT. Since the end of May 2019, NPTC is also the host authority for the Joint Scrutiny Committee to promote and facilitate projects between authorities involved in the City Deal.

**Figure 1: NPT Council Boundary**



1.3.3. NPTC have undertaken regular monitoring since the first LDP was adopted in 2016. Between January – March 2020 NPTC consulted on a Draft LDP Review Report in accordance with statutory requirements. This Draft LDP Review Report identified that the current NPT LDP should be subject to a ‘Full Review’, to be carried out in accordance with the 2005 Regulations. The LDP Review Report was subsequently approved and published by NPTC in July 2020.

- 1.3.4. The review ('the LDP Review') is needed to allow NPTC to prepare and adopt a RLDP to ensure that the statutory development plan for the NPTC area remains up to date, taking account of Future Wales 2040 which also now forms part of the statutory development plan for the Authority. In particular, a RLDP is needed to take account of a range of new Acts, policy frameworks, initiatives, evidence and spatial issues at national, regional and local levels since the adoption of the current LDP.
- 1.3.5. Following the approval of the Review Report, the Council prepared a Delivery Agreement which was subsequently approved by WG. Upon approval the Council commenced the preparation of the RLDP in January 2022 with a Call for Sites March-May 2022. Preliminary findings from the CfS, alongside information obtained from the Council's AMR's and growth projections, indicated that there was a requirement for additional housing land to be identified in addition to existing infrastructure and viability matters that required additional time to overcome. Given this, the Council decided to stop the preparation of the RLDP and start again with the preparation of a new Delivery Agreement. The new DA outlines the timeframes for the preparation of the new RLDP which will cover the plan period of 2023-2038, starting with a CfS in November 2023.
- 1.3.6. As part of the re-commencement of the RLDP, the Council has prepared this new ISA Scoping Report. This document includes the Candidate Sites Assessment Methodology and will be made available for statutory consultation for 5 weeks.

## **1.4. Call for Candidate Sites Assessment**

- 1.4.1. The Call for Candidate Sites is the first formal stage in the preparatory stages of the RLDP following the agreement and publication of the DA. Through the Call for Candidate Sites, the Council invites developers, landowners, site promoters, public bodies, service providers and others with an interest in land to submit sites which they wish to be considered as a potential allocation for either development or protection.
- 1.4.2. Below lists different Candidates Sites Assessment stages:

- Call for Candidate Sites
- Preparation of Candidate Sites Register
- Publication of Candidate Sites Register
- Stage 1 Initial Candidate Sites Assessment
- Stage 2 Detailed Candidate Sites Assessment Additional Information Request
- Stage 2 Detailed Candidate Sites Assessment
- Preferred Strategy Consultation
- Post Preferred Strategy Consultation Review of Information Submitted
- Deposit Plan Consultation
- Post Deposit Plan Consultation

1.4.3. To be as effective as possible, the Candidate Sites Assessment will incorporate the Integrated Sustainability Appraisal (ISA) for Candidate Sites to avoid assessment duplication. A refined set of sustainability indicators and a transparent scoring system will be adopted to allow prospective site promoters to consider the likely performance of their candidate site against the assessment criteria (See **Section 5.4 and Appendix C**).

1.4.4. In addition to the sustainability indicators, a number of other site suitability criteria will need to be taken into consideration in site assessment. These are provided below:

- Buildings of Local Importance;
- Compatibility with neighbouring uses (light, noise)
- Conservation Areas and their settings;
- Disused railway or freight transport infrastructure;
- Existing use of the site;
- Green wedge;
- Land contamination;

- Land instability;
- Mineral Safeguarding Areas;
- Pre-Assessed Area for Wind Development;
- Quiet areas;
- Safe access to the site for all users;
- Site search sequence (see PPW, Paragraphs 3.41-3.48);
- Sequential approach in national policy (see Future Wales Policy 6 and PPW Paragraphs 4.3.18-4.3.24) for retail, education, health, leisure and public services;
- SuDS;
- Water (including groundwater pollution);
- Whether development would lead to the loss of existing playing fields and/or recreational space;
- Whether the site would lead to the redevelopment of previously developed land (see PPW, pp. 37); and
- Undeveloped coast.

1.4.5. An initial call for Candidate Sites was undertaken in 2022 as part of the original start of work on the RLDP. Sites submitted at this time will also be considered as part of this process.

## **1.5. Statutory Requirements**

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

### **LDP Preparation and Review**

1.5.2. The publication of the Draft LDP Review Report (NPTC, 2020) has triggered a process through which a RLDP will be prepared and then adopted for the NPTC area. Statutory requirements relating to the preparation of LDPs are therefore now applicable to the LDP Review, including in respect of SA and SEA. The proposed approach, timescales and consultation arrangements for

the LDP Review are set out within the raft NPT LDP Delivery Agreement (2023) accompanying this ISA Scoping Report in accordance with the 2005 LDP Regulations (as amended).

- 1.5.3. This ISA Scoping Report has been prepared in the context of the consultation on the Draft LDP Review Report, including taking account of relevant consultation responses. Whilst each report fulfils separate statutory requirements, read together they provide a comprehensive and up to date evidence base of the key issues (spatial planning, sustainability, equalities, health, social, economic, cultural, etc) which all need to be addressed in the LDP Review and associated impact assessment processes.

### **Sustainability Appraisal**

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

## **Strategic Environmental Assessment**

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

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

1.5.10. The WBFGA 2015 seeks to directly place Wales on a sustainable path to improving well-being. The WBFGA requires that public bodies carry out sustainable development which is defined<sup>2</sup> as:

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

1.5.11. The WBFGA prescribes seven national Wellbeing Goals to be achieved through Five Ways of Working which public bodies need to demonstrate they have carried out in undertaking their sustainable development duty (see section 5 of this report). Furthermore, it requires Public Service Boards (comprising local authorities and partner agencies) to define local wellbeing objectives.

1.5.12. In response to this duty, the NPT We Want (Well-being Plan 2018-2023) sets out the NPT Public Services Board’s long-term vision for the area as well as priorities for action over the plan period. It identifies six wellbeing objectives which are to be used to guide and bring about wellbeing improvements for local people in the area. These are detailed in section 5 of this report.

1.5.13. Therefore, whilst there is not a specific statutory requirement to publish a WFG Assessment in respect of the LDP Review, there is a need for NPTC to demonstrate throughout the LDP Review how their emerging RLDP complies with the Section 3 duty (Well-being duty on public bodies to carry out sustainable development). In practice this means that the ISA should include specific reporting of likely effects from the emerging RLDP on wellbeing, the national wellbeing goals and local wellbeing objectives.

1.5.14. The DPM 2020 (3rd Edition) requires LDPs to demonstrate how it contributes towards the achievement of the well-being goals, objectives and five ways of

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<sup>2</sup> The Planning (Wales) Act 2015 Section 2 sets out the definition of sustainable development for the planning system and directly refers to the definition in the WBFG Act

working, noting that these goals should be integral to the preparation of the Scoping Report and subsequent development of the final SA framework to assess the Plans growth options, objectives, policies and proposals (Para 4.10 & 4.12). Each decision-making body must demonstrate compliance with the requirements of WBFGA 2015.

### **Equalities Impact Assessment**

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

### **Public Sector Equality Duty**

- 1.5.17. Section 149 of the Act sets out a ‘public sector equality duty’ which requires public authorities, in exercising their functions, to “*have due regard to the need to:*
- a. *eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under this Act;*

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<sup>3</sup> EU Directives 2000/78/EC, 2000/43/EC, 2006/54/EC (all enacted) and proposed Directive COM/2008/0426 final - CNS 2008/0140

- b. advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it;*
- c. foster good relations between persons who share a relevant protected characteristic and persons who do not share it.”*

1.5.18. The protected characteristics referenced within this duty are specified within Section 4 of the Act, namely: Age; Disability; Gender reassignment; Marriage and Civil partnership; Pregnancy and maternity; Race; Religion or belief; Sex; and Sexual orientation.

### **Socio-economic Duty**

1.5.19. In March 2021 the WG commenced the Socio-economic Duty under Sections 1 – 3 of the Equality Act 2010. The Socio-economic Duty places a legal responsibility on public bodies in Wales to actively consider how through their strategic decision making they can reduce inequalities of outcome caused by socioeconomic disadvantage. This differs from the Public Sector Equality Duty which considers only reducing inequalities of opportunity. However, the Socio-economic Duty identifies a need to consider both ‘communities of place’ and ‘communities of interest’ in terms of people who share an experience and are particularly impacted by socio-economic disadvantage.

1.5.20. Demographic groups who share one or more of the protected characteristics listed in Section 4 of the Equality Act 2010 can be considered ‘communities of interest’, meaning there is a direct link between the Socio-economic and Public Sector Equality Duties.

1.5.21. The Socio-economic Duty applies to the LDP Review as local authorities are prescribed bodies for implementing the duty under the Equality Act 2010 and the preparation of a RLDP clearly constitutes the making of decisions of a strategic nature by NPTC regarding their statutory functions.

### **Health Impact Assessment**

1.5.22. Whilst there are no statutory requirements to undertake a HIA of emerging plans or programmes, the SEA Regulations do require any likely significant

effects on human health to be assessed as part of a wider environmental assessment. Any identified likely significant adverse effects on the environment, including in respect of human health, should also be addressed through the implementation of suitable mitigation where appropriate. The assessment of likely health effects is also of direct relevance to the Public Sector Equality Duty set out within the Equality Act 2010, as socio-economic inequalities are recognised to be a key determinant of health.

1.5.23. Paragraph 4.16-4.17 in The DPM 2020 highlights the requirement in The Public Health (Wales) Act 2017 for a HIA to be carried out by public bodies. Although there is no statutory requirement stating when a HIA should be carried out, it outlines the role of the HIA in Wales to assist policy makers to maximise potential benefits and identify/mitigate against potential negative effects on health and wellbeing. In future plan-making, LPAs must have regard to the requirement and content of a HIA as stated in further legislation and guidance once published.

1.5.24. This ISA will therefore incorporate a proportionate HIA in order to demonstrate compliance with SEA and EqIA requirements relating to the assessment of likely health effects from the emerging LDP Review.

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

1.5.25. The Welsh Language (Wales) Measure 2011 and Standards require the following effects to be considered:

1.5.26. What effect, if any, the LDP would have on the opportunities for other persons to use the Welsh language, or treating the Welsh language no less favourably than the English language;

1.5.27. How the LDP could have positive effects or increased positive effects on opportunities for other persons to use the Welsh language, or treating the Welsh language no less favourably than the English language; and,

1.5.28. How the LDP could be developed so that it doesn't have or reduces any adverse effects which the policy decision would have on opportunities for other persons to use the Welsh language, or treating the Welsh language no less favourably than the English language.

1.5.29. In line with statutory requirements, PPW and WG expectations, the ISA incorporates a proportionate assessment of likely effects on the use of the Welsh language.

### **Habitats Regulations Assessment**

1.5.30. Regulation 63 of the Conservation of Habitats and Species Regulations 2017 (‘the HRA Regulations’) requires that a HRA must be undertaken to demonstrate compliance with applicable statutory duties where a plan or project is considered likely to have significant effects on European Sites and is not directly connected with or necessary for the management of the site. Caselaw has established that HRA requirements apply to the preparation of ‘local plans’ prepared for town and country planning purposes including LDPs, meaning that an HRA process must be undertaken for the LDP Review.

1.5.31. Whilst there are linkages between SEA and HRA, in view of the specific assessment requirements prescribed by the HRA Regulations and associated European legislation and caselaw, the HRA for the NPT LDP Review will be reported separately from the ISA. However, at this initial stage, and in the absence of any formal HRA Scoping requirements, it is considered appropriate for this ISA Scoping Report to identify relevant European Sites for consideration in subsequent ISA and HRA processes.

1.5.32. To differentiate between effects assessed in the context of the SEA and HRA Regulations, the term “*Likely Significant Effects*” (capitalised) is used throughout this report to refer to only those effects which are considered significant in the context of Regulation 63 of the HRA Regulations.

## **1.6. ISA Process**

1.6.1. By according with the above statutory requirements through a holistic approach, ISA is one of the key methods by which plan-making can deliver sustainable development. When used in this way from the outset of the LDP process, ISA Scoping is a plan-making tool rather than simply a reporting mechanism and can be considered as 3 main steps;

### **Screening and Scoping:**

- Whereas Regulation 5(3) has the effect that a SEA will always be required in relation to the preparation of an LDP, Regulations 5(6) and 9(1) require “minor modifications” to an existing plan or programme to first be screened to determine whether the modifications are likely to have significant effects on the environment and therefore whether a full SEA needs to be undertaken. The DPM continues to make it clear that SEA screening is required for all LDP Reviews as in legal terms the existing LDP is simply being reviewed and this could result in “minor modifications”, although the SEA Regulations do not define the scope of that term. This ISA Scoping Report sets out a draft SEA Screening Determination for the consideration of the SEA Consultation Bodies (Section 3).
- In terms of Scoping, Responsible Authorities must provide the SEA Consultation Bodies with sufficient information to enable them to consider the proposed scope, level of detail and consultation period for an ‘Environmental Report’ (ER) to accompany the emerging plan or programme. Where SEA is incorporated within a wider SA the term ER is interchangeable with SA Report as the latter necessarily includes all of the information that would be required within a standalone ER. Whilst there is no specific statutory requirement to undertake Scoping in relation to EqIA, HIA, WBF GA Assessment and Welsh Language Impact Assessment, the SA Scoping process raises a similar need for ‘assessment framing’ to undertake proportionate assessment of these. Thus, there is a need to confirm the scope of the ISA in all respects, ensuring robustness and proportionality throughout the process. The approach taken with the ISA Scoping Report responds to all statutory requirements, with the proposed ISA Framework, ISA methodology and ISA consultation arrangements detailed in Sections 5 and 6.

### **Assessment:**

- As noted above, in terms of SA, Section 62(6) of the 2004 Act requires Responsible Authorities preparing LDPs in Wales to “*to carry out a sustainability appraisal of the proposals*” within it and to “*prepare a report of the findings of the appraisal*”. Given that the LDP Review will be an iterative process and in legal terms is a review of the existing LDP, an ISA Report will need to accompany each substantive element of the RLDP as it emerges, in particular the preparation of LDP Pre-Deposit and subsequently LDP Deposit Documents. Each ISA Report must be consulted on in tandem with the emerging RLDP, with the ISA Report for the final LDP Deposit Document then submitted to the WG WG to support an independent examination of the RLDP. Similarly, Regulation 12 of the SEA Regulations requires Responsible Authorities to prepare and consult on an ER to “*identify, describe and evaluate the likely significant effects on the environment of implementing*” each iteration of a relevant and qualifying plan, as well as the effects of its reasonable alternatives. As above, the scope, level of detail and consultation period of the ISA, fully incorporating all SEA requirements, should first be defined through screening and scoping. In line with best practice established in DPM, the ISA brings together the statutory requirements under one joined-up process. This offers the opportunity to iteratively assess each stage of the emerging LDP in terms of EqIA, HIA, WBF GA Assessment (as well as Welsh Language Assessment which legally must be incorporated into SA); and,

### **Post Adoption:**

- By the end of the LDP Review process, a RLDP will have been adopted for the extent of the NPTC area. In terms of SA, once a RLDP is adopted, NPTC must prepare a statement setting out, amongst other matters, how the SEA’s environmental considerations have been taken into account in the adopted LDP, and how the likely significant effects of the LDP on the environment (as predicted through the SA/SEA) will

be monitored. Whilst there is no statutory requirement to prepare a SA (as opposed to SEA) Post Adoption Statement, in practice the incorporation of SEA within SA means this is necessary to ensure that all of the SEA findings and consultation responses from previous stages of the process are addressed. Following best SA practice, the Post Adoption process will be extended incorporating the SEA post adoption requirements alongside a demonstration of how the ISA (covering all assessment undertaken) has, as a plan-making tool, informed the preparation of the NPT RLDP.

## **1.7. Report Structure**

- 1.7.1. The remainder of this report is structured as follows:
- 1.7.2. Section 2 – LDP Review Context and Proposed Content describes the context in which the LDP Review is being undertaken and outlines the proposed form of the RLDP that will result, all of which requires to be assessed through this ISA;
- 1.7.3. Section 3 – In the context of SA/SEA only, this section consider the need for SEA (undertaken within the ISA) and provides a draft determination to explain why NPCBC considers it necessary to undertake a SEA as part of the ISA for the LDP Review. The section also provides relevant information to enable the SEA Consultation Authorities to advise on whether, at this stage, the RLDP is likely to generate significant effects. Section 3 is not a requirement for the other constituent assessments which are to be carried out through the ISA process;
- 1.7.4. Section 4 – Environmental Information and Key Sustainability Issues summarises pertinent environmental, equalities and health issues and conditions which must be taken account of within the emerging LDP Review and therefore within this ISA. It considers the evolution of the baseline in the absence of the LDP Review and notes the relationship between the NPT LDP and other relevant plans and programmes. Further relevant details are provided in **Appendices A and B**;

- 1.7.5. Section 5 – Proposed ISA Framework describes the assessment framework which will be used to identify and assess the likely significant environmental (incorporating socio-economic and cultural effects), health, wellbeing, Welsh language impact, and equalities effects from the LDP Review (i.e. the preparation of a RLDP). This section sets out a proposed ISA Framework to assess these as they emerge, including proposed ISA Objectives and guide questions;
- 1.7.6. Section 6 – Proposed ISA Methodology and Consultation Arrangements builds upon Section 5 by detailing the proposed method of assessing the likely significant environmental (incorporating economic, social and cultural), health, wellbeing, Welsh language impact, and equalities effects, health, wellbeing, and equalities effects (and through this the broader sustainability effects) of each emerging substantive component of a RLDP. The section also outlines the proposed consultation arrangements for the SA reports which will be published in tandem with each substantive proposal for the emerging RLDP, namely the LDP Pre-Deposit and LDP Deposit Documents; and,
- 1.7.7. Section 7 – Next Steps outlines next steps to be followed in the ISA process and confirms how comments in respect of this ISA Scoping Report should be submitted.
- 1.7.8. The Scoping Report is supported by two appendices:
- **Appendix A – Baseline Analysis** supports Section 4 by providing a review of relevant environmental (including social, economic and cultural) baseline characteristics. With reference to all environmental topics prescribed in Schedule 2 of the SEA Regulations (including population, health and material assets), Appendix A describes aspects of the environment likely to be significantly affected by the LDP Review and identifies relevant environmental, economic, social, and cultural issues, problems and environmental protection objectives which should be taken account of in the LDP Review and this SA process; and,

- **Appendix B – Review of Plans and Programmes** supports Section 4 by providing a review of all other plans and programmes of relevance to the LDP Review. Appendix B identifies the relationship between these other documents, the existing NPT LDP and the LDP Review to identify key policy issues which should be considered in both the LDP Review itself and this SA process.

## **2 NPT LDP Review Context**

### **2.1. Introduction**

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

### **2.2. NPT Review Key Facts**

2.2.1. Planning legislation requires all local planning authorities to commence a review of a LDP not later than 4 years from the date of adoption and to consider the need for a review following the publication of Future Wales.

2.2.2. This LDP Review is being undertaken to replace the NPTC LDP (2011-2026), adopted in January 2016. To undertake the LDP Review, Stantec UK is acting as the SEA Assessor on behalf of the Responsible Authority. The purpose of the Review is to inform the development of the new LDP for NPPT and to update the SEA Consultation Bodies on the scope and progress of the new Plan as it progresses.

2.2.3. The NPT LDP Review will result in the preparation and adoption of a RLDP for NPT. This will set out new detailed planning policies and proposals for the future development and the use of all land. The RLDP will set a long-term strategic planning framework, helping to tackle the key sustainability and regeneration issues and realise the main development opportunities across NPT. It will cover a wide range of topics, including but not limited to housing land, economic development, regeneration, sustainable design, renewable energy, town centres, tourism, infrastructure provision and transport.

2.2.4. The expected date of adoption for the Replacement Plan is April 2027. The Plan will cover a time period of 15-years (2023 – 2038).

### **2.3. Proposed Form and Content of the NPT RLDP**

- 2.3.1. The 2004 Act stipulates the process which must be undertaken for the LDP Review, in particular the preparation of LDP Pre-Deposit and Deposit Documents by the LPA, followed by an independent examination.
- 2.3.2. The 2004 Act and the 2005 Regulations prescribe the minimum content which must be included within any LDP, namely:
- The name of the area of the LPA for which the LDP is prepared;
  - The date of adoption and period of the LDP;
  - The LPA's objectives in relation to the development and use of land in their area;
  - The LPA's general policies for the implementation of those objectives;
  - A proposals map of the LPA's area showing the proposals for the development and use of land; and,
  - A reasoned justification of the policies contained within the LDP.
- 2.3.3. In addition, LDPs typically include an overarching vision, suite of objectives and a spatial strategy, although none are specifically required under the 2004 Act or the 2005 Regulations.
- 2.3.4. In line with statutory requirements, two iterations of the emerging RLDP will be consulted on by NPTC, namely a Preferred Strategy – RLDP Pre-Deposit Document and then a full RLDP Deposit Plan (Deposit Document). This RLDP Deposit Plan will subsequently be subject to an independent examination, following which it will be considered for formal adoption as the RLDP for NPT. The ISA methodology will be applied and the findings reported within iterative ISA Reports which will accompany the Preferred Strategy (RLDP Pre-Deposit) and Deposit Documents, with the ISA Report updated between these stages to reflect changes to the emerging RLDP:
- The ISA Report for the Preferred Strategy will focus on assessing likely significant effect (LSE) from the proposed RLDP options, spatial strategy and strategic policies; and,

- The ISA Report for the RLDP Deposit Document will identify and assess all LSE from each substantive component of the RLDP Deposit Document, including all proposed site allocations and policies.

2.3.5. Following the completion of an independent examination of the RLDP Deposit Document, all binding recommendations made by the appointed Inspector will be subject to ISA (incorporating SEA) screening to determine whether they would give rise to any new or different LSE not previously reported within the ISA Report for the RLDP Deposit Document. This SEA Screening will be documented specifically within a ISA Addendum. At this stage it is envisaged that the RLDP for NPT will comprise the following substantive components:

- Proposed RLDP vision and objectives;
- A spatial strategy (and potential sub-area strategies) to implement the RLDP vision and objectives;
- Strategic policies to implement the spatial strategy and RLDP objectives and to respond to key sustainability issues (Section 4.2 and Appendix A) and legislative requirements (Section 4.3 and Appendix B). In particular, strategic policies will need to implement specific requirements from the 2004 Act, the 2005 LDP Regulations, PPW, The NPT We Want (Well-being Plan 2018 – 2023) and the WBFGA 2015;
- Non-strategic policies to implement the spatial strategy and strategic policies through the development management process. This is likely to include areas based and thematic policies; and,
- Site allocations.

2.3.6. The above list of intended RLDP components is not exhaustive and may change through the LDP Review. Each emerging substantive component of a NPT RLDP will need to be subject to ISA, incorporating SEA, in line with the approach set out within this Scoping Report.

2.3.7. To comply with statutory and case law requirements, the RLDP will need to include a reasoned justification for the inclusion of each substantive component and be supported by a suite of evidence base documents. These

will inform the ISA process as well as being required for plan preparation purposes.

### **3 Draft SEA Screening Determination**

#### **3.1. Introduction**

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

#### **3.2. The Need for SEA Screening**

3.2.1. The adopted NPT LDP (adopted January 2016) was subject to a full SEA as part of the SA since it met the mandatory SEA criteria within Regulation 5(2) of the SEA Regulations in terms of being prepared for town and country planning and land use purposes and being likely to set the framework for future consent of developments listed in Annex I or II to Council Directive 85/337/EEC as amended. However, under the SEA Regulations, all proposed “*minor modifications*” to existing plans require the Responsible Authority to first determine, in consultation with the SEA Consultation Authorities, whether a SEA is required as a result of the modification being likely to have significant effects on the environment. The DPM advises that as the term “minor modification” is not statutorily defined, any review of an existing LDP (and thus any revisions to or replacement of it) should be subject to SEA screening to determine the need for a full SEA.

3.2.2. Even at this early stage owing to the intended comprehensive nature of the LDP Review, the RLDP is likely to comprise a suite of policies and site allocations that are substantially different from those in the existing LDP and which have the potential to result in LSE on the environment. Notwithstanding any advice forthcoming from the SEA Consultation Bodies, NPTC is therefore of the view that a formal SEA should be undertaken as part of the SA for the LDP Review.

3.2.3. Of note, even if it is determined that a formal SEA is not required this would make little difference, as likely effects in relation to the environmental topics

prescribed within Schedule 2 of the SEA Regulations (including population and human health) will still need to be assessed to present a robust assessment of the sustainability of the emerging RLDP, as required separately under the 2004 Act. The question of whether a formal SEA is required as part of the SA is therefore effectively a legal formality.

### **3.3. Draft SEA Screening Determination**

3.3.1. Having regard to the Screening criteria specified in Schedule 1 of the SEA Regulations, NPTC are of the view that, at this stage, the LDP Review (which will result in the adoption of a RLDP) has the potential to generate likely significant effects on the environment which have not previously been identified through the SEA of the existing LDP or of other plans and programmes. This is on account of:

- **Geographical Coverage:** As the 'Full Review' procedure is being adopted for the LDP Review, it will apply to the entirety of NPT rather than only to discrete sites or sub-areas. In consequence, the LDP Review will need to consider proposals for the management of environmentally sensitive areas, including sites designated at local, national and international levels for reasons of biodiversity conservation, geological importance or architectural significance. As such, the development of the RLDP is likely to result in a range of effects in relation to these sensitive areas;
- **Statutory Requirements:** As section 38(6) of the 2004 Act requires all planning applications to be determined in accordance with the relevant adopted Development Plan unless material considerations indicate otherwise, the RLDP resulting from the LDP Review will have a high degree of influence in setting a consenting framework for all development activities within NPT. This will include any projects of a type listed in Annex I or II to Council Directive 85/337/EEC (the original EIA Directive) as amended. In addition, the RLDP will be of particular importance in determining the acceptability, including in environmental terms, of the proposed location, nature, size and operating conditions of all development proposals. It is likely that the approach taken within a RLDP

to plan for these factors in relation to at least some development types will differ substantially from the approach set out within the existing LDP to reflect changes in baseline conditions and in relevant higher level legislative and policy frameworks. Any such changes in policy within a RLDP could affect the distribution or key characteristics (design, physical, construction, operational characteristics, etc.) of development proposals and could give rise to new or different likely significant effects from those previously predicted to arise from existing LDP policies;

- **New Spatial Issues and Site Allocations:** The preparation of a RLDP should directly address existing socio-economic and environmental issues affecting NPT, as identified in **Appendix A**, through the development of new policy approaches and site allocations. Through addressing pertinent issues and problems, the LDP Review is likely to result in LSE. For example, the NPT LDP Review Report (NPTC, 2020) identifies that new allocations within the Valleys and Coastal Corridor may need to be made to help enable its growth, which will include residential development, safeguard employment, cultural heritage and regeneration opportunities, while policy revisions may be required to reconsider the LDPs spatial growth strategy. Other land allocations and physical interventions may also need to be allocated within the RLDP to ensure it can appropriately respond to all identified population needs. Whilst some Candidate Site may have previously been subject to SA in relation to the first NPT LDP, due to the time that has elapsed it is highly likely that a range of new Candidate Sites will be proposed, each of which could generate a range of significant environmental effects which have not previously been assessed;
- **Plan Hierarchy:** As with the existing LDP, the RLDP should seek to direct particular types of development proposals to particular locations, and this may require lower level plans, for example Development Briefs, Masterplans, Regeneration Strategies or Supplementary Planning Guidance (SPG) to be prepared to provide more locally specific guidance in conformity with the LDP. The LDP Review is therefore likely to have a

high degree of influence on other plans within the Welsh planning policy hierarchy and this could itself result in a range of new or different likely significant environmental effects from those arising under the existing LDP; and,

- Potential for LSE on European Sites: As detailed in **Appendix A**, NPT hosts three European Sites (Kenfig/Cynffig (SAC), Coedydd Nedd a Mellte (SAC) and Crymlyn Bog (also a Ramsar Site, SAC, SSSI and NNR). with an additional three European Sites identified either within 15km of or with potential connectivity to NPT. This does not mean that LSE in HRA terms would necessarily occur from the LDP Review on these European Sites; indeed, in the absence of any substantive proposals or policies having been developed no evidence is yet available to indicate this. However, the possibility of the identified European Sites experiencing LSE from the LDP Review (i.e. from an emerging RLDP) cannot be ruled out at this stage and therefore requires further examination through undertaking a separate HRA process. In line with the DPM an HRA Appropriate Assessment is likely to be required in respect of the RLDP Deposit Plan in due course. Under Regulation 5(3) of the SEA Regulations, this alone triggers the need for a full statutory SEA to be undertaken.

3.3.2. Subject to views obtained from the SEA Consultation Bodies, NPTC therefore intends to make a determination under Regulation 9(1) of the SEA Regulations that a formal SEA will be carried out as part of the ISA for the LDP Review. This aligns with the approach advocated within the DPM.

3.3.3. In accordance with Regulation 9(2), the SEA Consultation Bodies are invited to provide their view and associated reasons regarding the potential for LSE to arise and the need (or otherwise) to undertake a SEA. Any advice to the effect that a formal SEA is not required would need to be supported by detailed evidence, as any decision not to undertake a formal SEA could be subject to legal challenge, which in turn could affect the validity of the LDP Review.

## 4 Key Sustainability Issues

### 4.1. Introduction

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

### 4.2. Key Sustainability Issues

4.2.1. With reference to the topics prescribed within Schedule 2 of the SEA Regulations, a summary of the key sustainability issues identified in **Appendix A** which need to be addressed within the LDP Review (including objectives associated with the WBFGA 2015 and Equality Act 2010) is provided in **Table 4.1** below and taken account of in the associated ISA framework. This summary has also been informed by consideration of the likely evolution of baseline conditions in the absence of the LDP Review, as detailed in **Appendix A**. In short, this concludes that the absence of the LDP Review is likely to result in a planning policy vacuum within NPT which could lead to development coming forward in unsustainable locations and contrary to NPTC's preferred spatial strategy simply in order to meet identified needs, principally for new housing.

4.2.2. In most cases, it is recommended that the identified sustainability issues should be addressed within the ISA through the inclusion of relevant objectives within a framework ('the ISA Framework') which will be used to assess the likely sustainability and environmental effects of the RLDP. Full details regarding the proposed ISA Framework and constituent SA Objectives are set out in Section 5.

4.2.3. The RLDP will need to take account of a range of new Acts, policy frameworks, initiatives, evidence and spatial issues at national, regional and

local levels since the adoption of the current LDP. These can be summarised as follows:

- **Contextual Changes:** Changes deriving from economic and social fallout from the Covid-19 pandemic, the impacts of Brexit and renewed efforts to reduce societal inequalities. Evidence base changes associated with WG Population and Household projections; policy shifts through the Future Wales 2040 the regional work associated with the Swansea Bay City Deal (SBCD); and the designation of the Port Talbot Waterfront Enterprise Zone, Celtic Freeport designation to deliver an accelerated pathway for Wales' net zero economy, and the work of the Valleys Taskforce. Broadly, but the implementation of these economic development strategies should drive higher rates of growth;
- **Level and Spatial Distribution of Growth:** In a context of recent difficulty in achieving housing and employment development targets, the level and spatial distribution of growth needs to be reconsidered to establish the most appropriate strategic approach to land use. This will entail developing a refreshed or new spatial strategy to underpin the RLDP;
- **Housing Land Supply.** A housing land supply shortfall has emerged, albeit in the context of lower than anticipated developer demand for housebuilding. In addition, the RR has identified a shortfall in housing delivery as one of the primary issues to be addressed in the RLDP; and,
- **Strategic Regeneration Areas:** Linked to issues around demand for land for housing and economic development, and a greater policy focus on viability within PPW, there will be a need to reconsider existing sites and allocate new effective sites. Future Wales 2040 identifies NPT, Swansea and Llanelli to be the main existing centre of population, employment and services within the Swansea Bay and Llanelli National Growth Area (NGA), acknowledging the region's potential in decarbonisation and tourism-based diversification.

4.2.4. New Policy Areas: PPW – 11th Edition continues a number of changes set in motion by PPW - 10<sup>th</sup> Edition including principles that will be needed to put

placemaking and driving place prosperity at the heart of development. Other statutory and national policy shifts which need to be implemented via the RLDP including responding to the wellbeing objectives set out by 'The NPT We Want (Well-being Plan 2018-2023) for NPT in accordance with the requirements of the WBF GA 2015, namely:

- I. Improve the well-being of children and young people;
- II. Improve the well-being of all adults; and,
- III. Develop the local economy and environment.

4.2.5. In addition, the WG has commenced the Socio-economic Duty (March 2021) under the Equality Act 2010 whilst NPTC has published their second Strategic Equality Plan (2020-2024) which focuses on enhancing health, well-being, community safety and quality of life for all. The plan also seeks to also improve staff training and implement the monitoring of data and information to identify and address disadvantages experienced by NPT residents. Overall, it seeks to improve access to services and information for all.

#### **Sustainability Performance of the Adopted NPT LDP (2016)**

- 4.2.6. The LDP Review Report (NPTC, 2020) identifies a number of main issues which fall within the SA topics.
- **Population:** The RR notes that latest 2019 'Joint Housing Land Supply Availability Study' has identified a housing land supply of 4.5 years, below the required 5 years for the first time since the plan was adopted. In addition, falling residual values and increases in build costs over the Plan has impacted housing viability and associated delivery of affordable housing and other planning obligations. Following the revocation of TAN1 in March 2020, the Council no longer assesses its five year housing supply position. Instead, in accordance with PPW and DPM, the Council publishes a housing trajectory as part of its AMR. The most recent AMR (2022) shows that the delivery of housing across NPT continues to fall behind the targets set out in the current LDP. Since the LDP base date (2011), the number of housing completions totals 2,457 dwellings compared to the annual cumulative target of 5,603. This shows that just

44% of the cumulative annual target has been delivered to date. With regard to employment, the current LDP monitoring framework sets a target to develop a minimum of 32ha of land on sites allocated for employment purposes up to 2026, aiming to deliver 2.5ha of land for employment purposes over the remainder of the Plan period with a cumulative target of 5ha to be developed over any two year period. The most recent AMR (2022) shows that the indicator was triggered in 2019 and that there had been no planning applications on allocated sites over the past monitoring year. Limited progress with regard to Strategic Regeneration Areas has also contributed to the shortfall. Indicators have also shown that there is a shortfall in the delivery of new small local retail development;

- **Climate Change:** The indicators in respect of the SA climate change objectives suggest that the LDP is not fully meeting aspirations in respect of climate change adaptation or mitigation. In particular, since Plan adoption, there have been instances where proposals have been approved within flood risk and protected areas contrary to policy; the LDP density requirements are often not being met; and the number of renewable/low carbon energy schemes has been lower than expected;
- **Natural Resources:** In respect of the SA natural resources objectives, NPT have expressed concerns that low density development has an unnecessarily large impact per unit on natural resources generally;
- **Biodiversity and Geodiversity:** Targets of preventing net loss of biodiversity are not being met, partly due to developments having adverse effects on locally designated and protected areas and partly due to a lack of biodiversity enhancement within development sites or funded through developer contributions;
- **Landscape, Townscape and Historic Character:** A small number of developments have been permitted contrary to LDP policy on landscape and green wedges, giving rise to concerns about meeting the SA objective to protect and enhance the area's landscape and townscape;

- **Community Cohesion:** Indicators showing the loss of community facilities, approvals for new 'town centre uses' in out of-centre locations and shortfalls in delivery of new housing and affordable housing, open space, employment floorspace and small scale local retail suggest some mixed impacts in respect of the SA social cohesion objective;
- **Health and Well-being:** Indicators showing loss of community facilities, shortfalls in open space provision and decreasing levels of workplace employment and economic activity suggest some mixed or negative impacts in respect of the SA objectives concerning health and poverty; and,
- **Material Assets:** Indicators showing difficulty in regenerating major brownfield sites with market conditions favouring, easier to develop, smaller scale land opportunities.

4.2.7. In summary, these issues give rise to a number of key Sustainability Issues which have been assessed alongside a review of the baseline environmental information identified in **Appendix A**. These are set out in accordance with the Environmental Assessment of Plans and Programmes (Wales) Regulations 2004 ('the SEA Regulations') criteria.

**Table 4.1: Key Sustainability Issues relating to the NPT LDP Review**

SEA Topic	Key Sustainability Issues
Biodiversity, Flora & Fauna	<p>The need to conserve, protect and enhance biodiversity including important species and sites designated for reasons of biodiversity conservation or ecological importance. This relates to the protection of designated sites located within NPT as well as designated sites in neighbouring authorities, all of which have the potential to be affected by the LDP Review and development activity within NPT.</p> <p>The need to identify areas and/or opportunities to secure the maintenance and enhancement of biodiversity and deliver a net benefit while ensuring the avoidance of adverse effects on locally designated and protected areas.</p> <p>The need to safeguard and enhance the green infrastructure network and to maintain and enhance landscape and biodiversity connections between designated sites and habitats, both locally and at a landscape scale (i.e. within NPT and to those in neighbouring authorities).</p> <p>The need to protect and enhance ecosystem resilience and safeguard resilient ecological networks (RENs).</p>

SEA Topic	Key Sustainability Issues
	<p>The need to fully consider the implications of the nature emergency. In addressing the above key issues, there is also a specific need to satisfy the biodiversity and resilience of ecosystems duty as prescribed within section 6 of the Environment (Wales) Act 2016.</p>
<p>Population (including relevant socio-economic issues)</p>	<p>The need to maximise socio-economic benefits from the opportunities identified in the Swansea Bay and Llanelli NGA and in the implementation of the Swansea Bay City Region Deal, particularly for the advancement of energy and manufacturing technologies and related employment opportunities in NPT.</p> <p>The need to align with the preparation of a potential Strategic Development Plan (SDP) for South West Wales in accordance with the WG's expectations.</p> <p>The need to encourage co-operation between neighbouring authorities in Plan making to facilitate cross boundary growth and partnership working.</p> <p>The need to plan for meeting the needs of an ageing population.</p> <p>The need to support the achievement of the NPT Local Wellbeing Objectives as part of meeting the sustainable development requirements (as set out in Section 3 of the WBFGA 2015).</p>

SEA Topic	Key Sustainability Issues
	<p>The need to deliver a sufficient quantum of good quality and well-located new housing to meet a range of identified needs.</p> <p>The need to deliver economic growth and increase employment opportunities, including for local residents.</p> <p>The need to tackle inequality of access to educational, training and employment opportunities.</p> <p>The need to tackle deprivation, including areas with existing deprivation linked to poor accessibility to key services, facilities and economic opportunities.</p> <p>The need to ensure that community facilities and services are appropriate and accessible to users to meet the diverse needs of residents and workers.</p> <p>The need to improve the accessibility of key destinations within NPT and to other key locations through enhancing the transport network.</p>
Human Health	<p>The need to enhance all aspects of the health and wellbeing of the population, including physical health, mental health, social wellbeing, safety and security.</p> <p>The need to protect and enhance access to community facilities, healthcare facilities, high quality open space provision and active travel routes for all residents.</p>

SEA Topic	Key Sustainability Issues
	<p>The need to create safe, healthy and liveable urban environments.</p> <p>The need to support the achievement of the NPT Local Wellbeing Objectives to improve the health of all NPT residents.</p> <p>The need to support the aims of the South West Wales Area Statement in relation to the 'Reducing Health Inequalities' theme.</p> <p>The need to address harassment and discrimination experienced by some residents with additional requirements.</p> <p>The need to monitor data and information with regard to the improvement in health for all residents.</p>
Soil	<p>The need to encourage and/or facilitate development on previously developed land.</p> <p>The need to safeguard the best and most versatile agricultural land from development.</p> <p>The need to maximise the efficient use of available land and prioritise the redevelopment of brownfield land.</p> <p>The need to safeguard geodiversity, important soil resources and to remediate areas of known contamination, particularly at post-industrial sites.</p>

SEA Topic	Key Sustainability Issues
	<p>The need to reduce emissions and nitrate pollution from agriculture.</p> <p>The need to minimise soil erosion and the loss of soils to non-permeable surfaces.</p> <p>The need to protect, enhance and restore important soil resources, including peatlands.</p> <p>The need to support the aims of the South West Wales Area Statement in protecting, enhancing and restoring important soil resources in relation to the ‘Ensuring Sustainable Land Management theme’.</p>
Water	<p>The need to protect and enhance the quality of water resources and the water environment. This extends to the protection of cross-boundary watercourses which flow through NPT and to the River Neath and River Afan which flow into Swansea Bay. It also requires the protection, maintenance and enhancement of drainage infrastructure. This includes the consideration of opportunities for integrated water catchment management as set out in the Swansea Bay ‘Opportunity Catchment Areas’ described in the third cycle River Basin Management Plans (RBMP) (2021-2027)</p> <p>The need to address impacts on water quality across the borough caused by point source pollution as a result of NPT’s industrial profile.</p>

SEA Topic	Key Sustainability Issues
	<p>The need to locate new development away from areas of flood risk, to fully mitigate potential flood risks from all sources, and to future-proof flood defences.</p>
Air	<p>The need to minimise the emissions of air pollutants.</p> <p>The need to safeguard and improve air quality, including through addressing areas with poor air quality.</p> <p>The need to address the poor air quality that resulted in the announcement of a public health crisis declared by Public Health Wales, particularly with regard to ammonia.</p>
Climatic Factors	<p>The need to ensure that the built environment and infrastructure is resilient and adaptable to the effects of climate change, taking account of the coastal location of NPT.</p> <p>The need to ensure that ecosystems and the natural environment are resilient and able to adapt to climate change.</p> <p>The need to mitigate climate change including through the decarbonisation of key economic sectors.</p>

SEA Topic	Key Sustainability Issues
	<p>The need to ensure that the RLDP meets aspiration in respect of climate change adaptation or mitigation. In particular, proposals contrary to policy within flood risk and protected areas and those failing to meet density requirements should not be approved.</p> <p>The need to encourage the development of renewable/low carbon energy schemes in NPT.</p> <p>The need to mitigate air and water quality impacts caused by industrial uses in the borough.</p> <p>The need to mitigate and address the climate emergency declared by the WG in April 2019.</p> <p>The need to support the aims of the South West Wales Area Statement in mitigating and adapting to climate change in relation to the aims of the ‘Mitigating and Adapting to a Changing Climate’ theme.</p> <p>The need to mitigate and address the nature emergency declared by the WG in June 2021.</p> <p>The need to support the aims of Shoreline Management Plans (SMPs) in addressing coastal erosion.</p>
Material Assets	<p>The need to maximise the efficient use of land, natural resources and existing infrastructure. This includes the need to prioritise the redevelopment of brownfield land, the re-use and recycling of materials, and the minimization of waste sent to landfill.</p>

SEA Topic	Key Sustainability Issues
	<p>The need to address socio-economic impacts in areas experiencing post-industrial decline through new development.</p> <p>The need to understand the impacts on natural resources due to footprint of development.</p> <p>The need to identify opportunities for action to create healthy places for people as set out in the DISRUPT framework in the Second State of Natural Resources Report (SoNaRR 2020).</p>
Cultural Heritage	<p>The need to preserve, protect and enhance historic assets and their settings within NPT.</p> <p>The need to safeguard and support growth in the use of the Welsh language.</p>
Landscape	<p>The need to protect and enhance landscape character, townscape character, key views and visual amenity. This extends to the protection of landscapes in the parts of NPT within the Brecon Beacons National Park and in other neighbouring authorities.</p> <p>The need to protect tranquillity and address light pollution issues as set out in the TAN 11: Noise and TAN12: Design.</p>

<b>SEA Topic</b>	<b>Key Sustainability Issues</b>
Inter-related effects	<p>The need to deliver holistic improvements to wellbeing and to contribute to the delivery of sustainable development across NPT, particularly with regard to the promotion of social cohesion.</p> <p>The need to promote access to services and information for all to ensure equality of access for residents with additional needs.</p>

### **4.3. Relationship between the LDP Review and Other Relevant Plans and Programmes**

4.3.1. The following types of plans and programmes were examined for their relevance to the LDP Review and this ISA:

- International conventions and treaties;
- European Directives and associated legislation;
- Legislation enacted by the UK Parliament and the WG; and,
- Policy documents and strategies published at the national, regional and local levels, including by the UK Government, the WG (and its agencies), NPTC and the NPT Public Service Board (NPTPSB).

#### **Implications of Recent Changes to Welsh National Planning Policy**

4.3.2. On 24<sup>th</sup> February 2021, both PPW11<sup>th</sup> Edition and Future Wales 2040 were published by the WG. The publication of Future Wales 2040, along with the LDP forms part of the statutory development plan for Wales. PPW 10<sup>th</sup> Edition, TAN1, TAN8 and the Wales Spatial Plan are now revoked. The main implications of the publication of these documents are outlined below:

- **Future Wales 2040**
  - The implementation of a four region approach, containing three NGA and 11 Regional Growth Areas (RGAs);
  - The introduction of specific climate change targets, namely that 70% of electricity consumption is to be generated from renewable energy by 2030, one gigawatt of renewable energy capacity is to be locally owned by 2030 and that new renewable energy projects to have at least an element of local ownership from 2020;
  - The removal of TAN8 and Strategic Search Areas, replaced by Pre-Assessed Areas for Wind Energy, covering C.281,0000 hectares (from a previous 77,000 ha for SSAs) and the introduction of Priority Areas for District Heat Networks;

- The need for preparation of SDPs in conformity with Future Wales 2040 (of which NPT will form part of the South West Wales SDP). The SDPs should consider strategic regional issues including future growth areas, housing demand, economic development, transport and green infrastructure, responding to the Future Wales Outcomes in Chapter 3 of Future Wales and,
- NPT is identified as part of the Swansea Bay and Llanelli NGA (Policy 28) Strategic and LDP should recognise the NGA as the focus for strategic economic and housing growth; essential services and facilities; advanced manufacturing; transport and digital infrastructure.

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- The ability to deliver housing requirements must now be demonstrated through a housing trajectory, prepared as part of the development plan process and forming part of the plan. The housing trajectory will form part of the evidence base for the development plan AMRs replacing Housing Land Supply and resulting in the revocation of TAN1: Joint Housing Land Availability Studies.

4.3.3. Strengthened commitment to renewable energies to address the Climate Emergency in support of the targets announced by Future Wales 2040. A detailed review of the other plans and programmes identified as relevant to the LDP Review is provided in **Appendix B**. From this review, it is clear that the RLDP should:

- Seek to capitalise on the socio-economic opportunities presented by the Swansea Bay City Deal Project and the Swansea Bay and Llanelli NGA;
- Align with Future Wales and the requirement for the preparation of a SDP for South West Wales;
- Seek to enhance all aspects of health and wellbeing for the population of NPT, including through providing high quality health infrastructure, improving physical and mental health and providing opportunities to enhance social wellbeing. In accordance with Section 3 of the WBFGA,

the LDP Review (resulting in the adoption of a RLDP) should contribute to sustainable development and support the achievement of locally defined wellbeing objectives as set out within the NPT We Want (Well-being Plan 2018 – 2023);

- Secure sustainable economic growth and inward investment across NPT through allocating suitable sites for development and by delivering the infrastructure required to increase connectivity, improve community and social infrastructure and increase access to high quality employment and economic opportunities. It will also be important for the RLDP to set out a spatial strategy which maximises the economic competitiveness of NPT and improves social wellbeing, taking account of its position on the hinterland of the Swansea City Region and its current socio-economic conditions;
- Identify and plan to meet the needs of all residents and workers within NPT, in particular with respect to the provision of adequate community infrastructure;
- Deliver well-designed and affordable homes to meet identified housing needs, including providing a range of sizes and tenures;
- Reduce car dependencies and improve active travel infrastructure;
- Deliver improved and expanded transport links, public transport and enhanced communications infrastructure, both to communities within NPT and to key destinations in neighbouring authorities;
- Protect and enhance access to high quality outdoor sports facilities, parks and open spaces;
- Conserve, preserve, protect and enhance sites designated at international, national and local levels for reasons of biodiversity conservation, ecological importance, geological importance or heritage significance, in ways appropriate to their status;
- Develop effective community engagement techniques to respond to the views of wider communities and facilitate effective community cohesion;

- Promote the efficient use of resources, including moving towards a low carbon economy, use of waste as a resource, energy efficient buildings, and appropriate renewable and low carbon energy;
  - Take measures to protect air quality levels and aim to mitigate any activity which could affect air quality levels across NPT;
  - Ensure there are no significant negative impacts on internationally and nationally designated nature sites (refer to separate HRA Initial Screening Report for further details);
  - Give full consideration to the potential impacts on water, including water quality, ecosystems, sustainable use of water, capacity of sewerage, flood risk and the opportunities to improve flood risk management;
  - Seek ways to maximise multi-functional green infrastructure coverage and ensure they provide a network of linked wildlife corridors (across a wide range of scales and increase ecosystems services including biodiversity);
  - Seek ways to maximise the health benefits of green infrastructure;
  - Use land efficiently by prioritising the use of previously developed land;
  - Consider soil quality and agricultural land classification when assessing potential development sites;
  - Recognise the different landscapes in the NPTC area and their capacity to accommodate change; and,
  - Promote development that minimises landscape impacts and protects landscapes appropriate to their significance.
- 4.3.4. To ensure that the LDP Review addresses the key policy issues listed above, it will be necessary for them to be considered throughout the ISA. As with the identified key sustainability issues (Section 4.2 above), this will be done through the application of a holistic ISA Framework, including constituent ISA Objectives, as a core element of the ISA process. The proposed ISA Framework to support the NPT LDP Review is detailed in Section 5.

## 5 Proposed NPT RLDP ISA Framework

### 5.1. Introduction

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

### 5.2. Summary of Existing SA Framework LDP Review

- 5.2.1. **Table 5.1** below lists the Sustainability Appraisal Objectives (SA Objectives) within the existing NPT LDP SA Framework (2016) and considers their

continuing validity. This has been carried out with a view to incorporating the SA framework within a broader ISA framework to inform the LDP Review.

5.2.2. The review of the existing NPT LDP SA Framework provided in **Table 5.1** indicates that whilst all components remain valid, a new ISA Framework is required to:

- Ensure the ISA and more widely the preparation of a RLDP responds to the identified key sustainability issues (**Table 4.1**);
- Account for policy changes at all spatial scales;
- Reflect the inclusion of wider assessment topics by changing from a ‘SA’ to a ‘ISA’;
- Respond to points which could improve the application of the framework; and,
- Respond to issues which the framework has not covered.

### **5.3. Review of the Existing NPT LDP SA Framework**

5.3.1. The starting point of this ISA process is to consider whether the SA Framework devised for the SA (incorporating SEA) of the first NPT LDP remains valid or if a revised framework is needed to allow the LDP Review ISA to proportionately and effectively respond to key sustainability issues identified in Section 4. Temporarily leaving aside the change in scope between the SA previously reported and the ISA now being undertaken, **Table 5.1** provides a review of the existing SA Framework for the adopted NPT LDP (201-2026). This considers the continuing validity of the current SA Objectives, including in the context of the LDP Review now being subject to a broader ISA process.

**Table 5.1: Review of the Existing NPTC LDP SA Framework**

**NPT LDP SA Objective 1: Climate Change**

Goal:

A community that is resilient to the likely impacts of climate change and minimises greenhouse gas production.

NPT LDP SA Objective	Assessment of Continuing Validity
1A: Ensure that all development takes into account likely future changes resulting from climate change (Adaptation).	The SA objective directly addresses climate change adaptation priorities. This remains valid.
1B: Achieve government targets for reducing greenhouse gas emissions (Mitigation).	Directly addressed the need to achieve government targets. This remains valid. Targets are now more ambitious than previously.
1C: Make the area's appropriate contribution to national energy production (Mitigation).	This SA Objective usefully focuses on renewable energy generation and is appropriately supportive policy framework for the development of renewable energy schemes. This remains valid.

Overall assessment of continuing validity:

The overall Climate Change SA Objective clearly remains valid. Climate change effects and implications have become more evident over the course of the LDP and Government targets have been increased accordingly. The preceding sections have demonstrated that the LDP has not fully met aspirations in respect of climate change adaptation or mitigation. But this is an issue with the application of LDP policy rather than the SA Objective itself. The WG set a new target of reduction of 95% from 1990 levels by 2050 in 2019 and declared a climate emergency in 2019.

However, in their current form the three objectives 1a-1c risk isolating specific aspects of climate change and, in the context of now undertaking a broader ISA, undermining assessment proportionality. A more holistic approach to achieving climate change adaptation and mitigation should therefore be adopted in a new ISA Framework. This should incorporate Objectives 1a-1c which already act as criteria or questions which prompt the identification of impacts. They should be joined with other criteria/questions to provide a more holistic Climate Change SA objective.

It is recommended that one Climate Change ISA Objective is developed with a specific purpose, and this should be supported by a series of criteria or questions to guide LDP development incorporating and adding to 1a-1c.

**NPT LDP SA Objective 2: Natural Resources and Waste**

Goal:

A community that protects and enhances natural resources and minimises the generation of waste.

NPT LDP SA Objective	Assessment of Continuing Validity
2A: Minimise loss or degradation of natural resources while ensuring that they are used only in a sustainable way.	This remains a valid element of an overall approach to the quantity of natural resources.
2B: Maintain and improve the chemical and biological/ecological quality of natural resources.	This remains a valid element of an overall approach to the quality of natural resources.
2C: Minimise waste and reduce amounts of waste disposed of to landfill.	This remains a valid element of an overall approach to reducing waste and landfill.

Overall assessment of continuing validity:

The overall SA objective on Natural Resources and Waste remains valid and there remains a strong rationale to incorporate these within one objective.

In its current form the three objectives 2a-2c risk isolating specific aspects of the issue of natural resources and waste.

The Environment (Wales) Act 2016 and National Natural Resources Policy (NNRP) (2017) contain policy implications – such as the principles of Sustainable Management of Natural Resources - which could be reflected in the SA Objective criteria. TAN 21 and PPW have been updated, two important outcomes are a focus on circular economy and prevention via the waste hierarchy.

It is recommended that one natural resources and waste ISA Objective is developed with a specific purpose, and this should be supported by a series of criteria or questions to guide LDP development incorporating and adding to 2a-2c.

### NPT LDP SA Objective 3: Biodiversity and Geodiversity

Goal:

A community where biodiversity and geodiversity are valued and a healthy and diverse natural ecosystem is nurtured, supported and enhanced.

NPT LDP SA Objective	Assessment of Continuing Validity
3A: Prevent any further net loss of biodiversity.	This remains a valid element of an overall approach to protecting biodiversity, particularly in terms of providing an explicit commitment.
3B: Exploit all reasonable opportunities to secure biodiversity enhancements.	This remains a valid element of an overall approach to enhancing biodiversity.
3C: Minimise adverse effects on designated geodiversity sites.	This remains a valid element of an overall approach to protecting geodiversity and biodiversity sites could also be explicitly addressed.

Overall assessment of continuing validity:

The overall SA objective on Biodiversity and Geodiversity remains valid and there remains a strong rationale to incorporate these within one objective.

Changes in the Environment (Wales) Act 2016 and PPW have added further weight to the SA Objective, this now requires biodiversity enhancement and this should be recognised. The role of Green Infrastructure has also been heightened The Section 6 duty introduced by the Environment Act and the well-being goals set out in the Wellbeing of Future Generations Act – the importance of biodiversity in ‘resilience’ – must be key considerations cutting across SEA objectives.

In its current form the three objectives 3a-3c risk isolating specific aspects of biodiversity and geodiversity. A more holistic approach to biodiversity and geodiversity should be taken. This should incorporate Objectives 3a-3c which already act as criteria or questions which prompt the identification of impacts. They should be joined with other criteria/questions to provide a more holistic biodiversity and geodiversity objective. Other factors including green infrastructure and human-environmental relations, e.g. the provision of access to nature for all communities should also be addressed.

The issue of soil quality protection is not included within the framework and should be included within a new Objective.

It is recommended that one Biodiversity and Geodiversity and Soil ISA Objective is developed with a specific purpose, and this should be supported by a series of criteria or questions to guide LDP development incorporating and adding to 3a-3c.

### NPT LDP SA Objective 4: Landscape, townscape and historic character

Goal:

A community where the County Borough’s distinctive and varied landscapes, townscapes and historic character are valued, conserved and enhanced.

NPT LDP SA Objective	Assessment of Continuing Validity
4A: Protect and/or enhance the area's landscape and townscape.	This remains a valid element of an overall approach to both landscape and townscape. However, it does not specifically mention historic landscapes or assets.
4B: Protect and/or enhance the area's historic environment including architectural and archaeological resources.	This remains a valid element of an overall approach to protecting and enhancing the historic environment.

Overall assessment of continuing validity:

This SA Objective succinctly identifies some key elements of landscape protection of relevance to the area but does not include historic landscapes. It therefore misses an opportunity to demonstrate compliance with Schedule 2 of the SEA Regulations with regards to the assessment of likely significant effects on “cultural heritage”. This is important as cultural heritage is not explicitly addressed elsewhere in the current SA Framework.

Changes in the Environment (Wales) Act 2016 and PPW have added further support to the validity of each element (landscape, townscape, historic character) of the SA Objective. The principles of Sustainable Management of Natural Resources has implications. Interlinked with biodiversity and geodiversity, opportunities for species and habitat connectivity should be considered on a landscape scale. The placemaking theme introduced by PPW10 and continued in PPW11, together with TAN12 (Design) amended in 2016 means a closer link between heritage and placemaking could be made via new criteria – criteria could be focused on protection and maintaining distinctiveness.

The preceding section has demonstrated that the LDP has not fully met aspirations in respect of landscape designation protection. Whilst this is an issue with the application of LDP policy rather than the ISA Objective itself, the ISA Objective's criteria or questions could include specific reference to landscape designations.

**NPT LDP SA Objective 5: Pollution (Air quality, noise and light)**

Goal:

A community free from significant air, noise and light pollution.

NPT LDP SA Objective	Assessment of Continuing Validity
5A: Achieve acceptable levels (meet national/European standards) of air quality throughout the County Borough.	This remains a valid. Air Quality was identified as a Key Issue for the LDP Review to address.
5B: Achieve acceptable noise levels and protect quiet areas throughout the County Borough.	This remains valid.
5C: Reduce light pollution.	This remains valid.

Overall assessment of continuing validity:

Given the specific land use implications of reducing and mitigating air pollution, and its specific identification within Schedule 2 of the SEA Regulations, it is recommended that a separate Air Pollution ISA Objectives is created. Light and Noise pollution are more appropriately addressed under a holistic Health and Wellbeing objective. The relevant ISA Objectives should be supported by a series of criteria or questions to guide LDP development incorporating and adding to 5a-5c. Changes to PPW will need to be accounted for. PPW now refers to the need to promote appropriate soundscapes depending on context.

## NPT LDP SA Objective 6: Community Cohesion

### Goal:

A community whose culture and character are enhanced, and individuals are not limited by social exclusion.

NPT LDP SA Objective	Assessment of Continuing Validity
6A: Improve social cohesion and minimise the incidence of social exclusion by addressing the causes of social exclusion.	This remains a valid element of an overall approach to reducing social exclusion and promoting socio-economic equality of opportunity and outcome.
6B: Protect and enhance the culture and character of communities including cultural resources and Welsh language.	This remains valid. The importance of assessing for impacts on Welsh language have been confirmed within PPW 11 <sup>th</sup> edition, TAN20, Planning Wales Act 2015 and PM (3 <sup>rd</sup> Edition) (2020).

### Overall assessment of continuing validity:

Both criteria remain valid, but it is recommended that these are separated into an objective on socio-economic aspect of social inclusion opportunity and another on cultural heritage and protection including the protection of the Welsh Language. PPW 11 considers protection of the Welsh language within ‘cultural considerations’, alongside the historic and cultural environment and promoting cultural value and experience.

**NPT LDP SA Objective 7: Health and wellbeing (including poverty/ deprivation)**

Goal:

A community where individuals have the opportunity to realise their potential unhindered by ill health or poverty

NPT LDP SA Objective	Assessment of Continuing Validity
7A: Improve physical and mental health outcomes for all.	This remains a valid element of an overall approach to improving health and wellbeing by recognising links with poverty and deprivation.
7B: Reduce/minimise the incidence and impacts of ill health by addressing the causes and consequences of ill health, health inequalities and poor wellbeing.	This remains a valid element of an overall approach to improving health and wellbeing by recognising links with poverty and deprivation.
7C: Reduce/minimise the incidence and impacts of poverty by addressing the causes and consequences of poverty.	This remains a valid element of an overall approach to improving health and wellbeing by recognising links with poverty and deprivation.

Overall assessment of continuing validity:

The overall SA objective on Health and Wellbeing remains valid and there remains a strong rationale to incorporate these within one SA objective.

The preceding section has demonstrated that the LDP has not fully met aspirations for improved economic outcomes – strongly linked to health. This is not an issue with SA framework and the validity of the overall SA Objective, which takes a holistic approach to health and wellbeing remains sound overall.

To ensure that the ISA complies with Schedule 2 of the SEA Regulations, takes account of the WBFGA 2015 and fully incorporates the requirements of Wellbeing Assessment with the ISA, a new ISA Objective should incorporate 7a) to 7c) and be extended to include other criteria in order to promote a holistic interpretation of health and wellbeing, including physical health, mental health, social wellbeing, safety and security. As such, criteria should explicitly capture issues including mental health, educational attainment, crime prevention, residential amenity and multiple deprivation.

### NPT LDP SA Objective 8: Economy

Goal:

A community where the local economy is resilient to global economic, social and climatic change and creates/ sustains a good quality of life for all residents within the community.

NPT LDP SA Objective	Assessment of Continuing Validity
8A: Develop and support a local economic infrastructure that is attractive to business and that meets the changing needs of the local and national community.	This remains a valid element of an overall approach to improving the local economy.
8B: Develop and support an economy that safeguards while complementing, promoting and enhancing investment in, and the use of, local resources and environmental assets.	This remains a valid element of an overall approach to improving the local economy.
8C: Develop and support an economy that complements, uses and enhances the skills and knowledge of the local community.	This remains a valid element of an overall approach to improving the local economy

Overall assessment of continuing validity:

The overall SA objective on Economy remains valid and there remains a strong rationale to incorporate these within one objective.

The preceding section has demonstrated that the LDP has not fully met aspirations in respect of economic growth particularly in terms of its spatial focus. While this is an issue with the application of LDP policy rather than the SA Objective itself, the SA Objective's criteria or questions could include specific reference to ensuring economic growth achieves regeneration aims.

In its current form the three objectives 8a-8c risk isolating specific aspects of Economy. A more holistic approach to economic growth and resilience should be taken. This should incorporate ISA Objectives 8a-8c as criteria rather than separately. Regeneration strategic priorities could also be addressed through other SA Objectives regarding land use, reducing inequalities, placemaking and social wellbeing.

To be more effective, a new suite of more integrated ISA Objectives focused on economic growth, regeneration, investment and employment should take account of the updated context including, the implications for NPT of the Swansea Bay City Deal, Enterprise Zone at Port Talbot, Celtic Freeport, potential for the Swansea Bay Metro and Future Wales. There is also the opportunity to consider the link between The WBFGA which could provide an additional focus on skills and inclusion as key to sustainable economic growth.

## **5.4. Proposed ISA Scope and Objectives for the LDP Review**

5.4.1. This subsection provides an overview of the topics which need to be considered through this ISA and therefore within the ISA Framework. The scope of the ISA Framework must be sufficiently wide to enable the likely significant environmental effects and the likely equalities and health effects of the emerging LDP Review to be identified and addressed in accordance with statutory requirements (Section 1 and above at paragraph 5.3.3). From Section 4.3 it is also clear that the ISA Framework should be broader than that previously used for the NPT LDP. Explicitly, ISA Objectives which respond to the following legal requirements need to be incorporated within the framework:

- SA as required under the Planning and Compulsory Purchase Act 2004 and the Development Planning (Wales) Regulations 2005 ('the 2005 Regulations');
- SEA as required by the Environmental Assessment of Plans and Programmes (Wales) Regulations 2004 ('the SEA Regulations');
- Supporting the implementation of wellbeing goals and wellbeing objectives (and the discharge of associated duties) as required under the WBFGA 2015. The preparation of the RLDP needs to consider social, economic, environmental and cultural well-being;
- Equalities impact assessment (EqIA) under the Equality Act 2010;
- HIA – non-statutory but needed to support robust SEA, EqIA and wellbeing assessment processes; and,
- Welsh Language Impact Assessment (WLIA) as required under the Welsh Language Standards (No.1) Regulations 2015 and PPW -11th Edition.

### **SEA/SA**

5.4.2. The ISA Framework will need to address all environmental topics prescribed within Schedule 2 of the SEA Regulations (refer to Section 1.5), as there is potential for significant effect on all that cannot be scoped out at this stage and will therefore require further examination through the ISA process. The

inclusion of 'population', 'human health' and 'material assets' as SEA topics provides a basis upon which to assess likely equalities and health effects using the same ISA Framework, as detailed below. In accordance with the SEA Regulations, the ISA will also assess inter-relationships between effects arising in relation to these environmental issues.

### **Wellbeing of Future Generations**

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

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

- 5.4.4. The WBFGA is at the heart of the planning system. PPW (2021) is now driven by the need for a placemaking approach at the heart of planning and is tasked with delivering the vision of the Wales as set out in the WBFGA.
- 5.4.5. To achieve this, the ISA Scope and the ISA Framework must therefore demonstrate how the RLDP will maximise its contribution to the achievement of the WBFGA seven well-being goals. In the first instance, the definition of sustainable development provides a clear sustainability principle at the heart of the ISA which will have to be approached consistently within the ISA framework. The ISA framework must incorporate the seven well-being goals which public bodies are required to achieve; these are:
- A prosperous Wales;
  - A resilient Wales;
  - A healthier Wales;
  - A more equal Wales;
  - A Wales of cohesive communities;
  - A Wales of vibrant culture and thriving Welsh language; and,

- A globally responsible Wales.

5.4.6. These well-being goals will be incorporated within the ISA Framework and will cut across ISA Objectives. They reinforce many aspects of the SEA Schedule 2 topics with a particular focus on assessing the long-term effects of the RLDP on human and population health. The ISA scope and ISA Framework will need to consider economic prosperity rather than short-term growth, this is likely to mean a focus on low carbon transition and achieving a more productive and more inclusive economy. It will need to consider how resilience can be achieved by addressing climate change, for example, and the role for and mutual benefits of biodiversity in improving human health outcomes. Health will need to be considered in terms of physical and mental wellbeing and the land use implications of this understood. The link between good health and socio-economic opportunity will need to be assessed to ensure opportunities for good growth are spread as equally as possible. The achievement of social cohesion through land use decision making, such as through investment in physical infrastructure, will therefore need to be assessed and understood. The importance of maintaining distinctiveness within NPTC area and the multiple ways in which land use decisions, in terms of their cultural, physical, linguistic, and social impacts, can impact these must be identifiable and considered. Finally, when these factors are considered together, the ISA Framework must help NPTC to identify how it will contribute to its global sustainability responsibilities.

5.4.7. The WBFGA 2015 identifies five ways of working which public bodies must demonstrate they have carried out when undertaking their duty to achieve sustainable development:

- Looking to the long term so that we do not compromise the ability of future generations to meet their own needs;
- Understanding the root causes of issues to prevent them from occurring or getting worse;
- Taking an integrated approach so that public bodies look at all the well-being goals in deciding on their well-being objectives;

- Involving a diversity of the population in the decisions that affect them; and,
  - Working with others in a collaborative way to find shared sustainable solutions.
- 5.4.8. The ISA framework through its holistic approach to the RLDP appraisal, and with the Well-being Goals integrated within, will help ingrain the five-ways of working within the plan-making process.
- 5.4.9. To implement the WBFGA at a local level, NPTC has produced a statutorily required Well-being Plan which shapes the approach taken to relevant Council policies, programmes, and strategies. The NPTC RLDP falls within this remit and there are clear implications for the ISA Scope and the content of the ISA Framework. The NPT We Want (Well-being Plan 2018-2025) identifies six local well-being objectives which the Public Services Board intend to pursue to improve the well-being of the people who live in the NPT area:
- Objective 1: To support children in their early years, especially children at risk of adverse childhood experiences;
  - Objective 2: Create safe, confident and resilient communities, focussing on vulnerable people;
  - Objective 3: Put more life into our later years - Ageing Well;
  - Objective 4: Promote well-being through work and in the workplace;
  - Objective 5: We value our green infrastructure and the contribution it makes to our Well-being; and,
  - Objective 6: Tackling digital exclusion.
- 5.4.10. These well-being objectives will be incorporated within the ISA Framework and will cut across ISA Objectives. They reinforce and provide a locally specific implementation mechanism of the WBFGA within NPT. Currently 30% of children in NPT live in poverty. The ISA Framework will need to target the RLDP towards improving long term opportunities and outcomes for children. Housing, particularly ensuring safe housing for people with

particular needs, will be a key focus for the RLDP. One key issue identified which has not been covered under the existing SA framework is that of Housing. Given the key issues identified in Section 4 and issues raised in the NPT Well-being Plan (2018-2025), it is recommended that a standalone housing objective is also identified in the ISA framework.

- 5.4.11. Housing is a cross cutting issue and a driver of wellbeing. It is integral to meeting the needs of an ageing population which has many implications, particularly in terms of housing and access to services to improve not just life expectancy but healthy years expectancy. Across generations, the ISA Framework will need to be geared towards ensuring better employment prospects within NPT addressing not just employment rates but the quality of employment and access to opportunities. The ISA Framework will contain biodiversity criteria, but it is important to ensure that these reinforce the human benefits of green infrastructure. The ISA Framework will need to recognise the link between sustainable economic growth and digital connectivity. The Swansea Bay City Deal is predicated on internet-based opportunities to grow quality employment opportunities across the region. Celtic Freeport designation is aimed to deliver an accelerated pathway for Wales' net zero economy. Hence, the ISA Framework will need to demonstrate how this is supported.

#### **Equalities Impact Assessment**

- 5.4.12. The EqIA will be undertaken by assessing the performance of the emerging LDP Review against objectives from the ISA Framework relating to tackling inequalities and promoting equality and social inclusion. The EqIA will implement the Public Sector Equality and Socio-economic Duties under the Equality Act 2010.
- 5.4.13. The objectives of the EqIA process are to integrate the consideration of relevant equalities issues and impacts into the development of the RTS from the outset and, in doing so, to demonstrate compliance with the Public Sector Equality Duty and the Socio-economic Duty. These duties will be used as tools to inform and embed key equalities issues within the LDP Review from the outset. Acting together with all other statutory assessments included

within the ISA, this integrated approach allows the environmental, social, and economic implications of all strategy components to be tested at the earliest opportunity and for any uncertainties or issues identified during impact assessment processes to be addressed during the preparation of the RLDP.

- 5.4.14. Insofar as the development plan affects access to services, amenities, economic opportunities and social activities, the LDP Review (resulting in the adoption of a RLDP) is likely to result in different impacts upon different demographic groups, persons with protected characteristics and those facing socio-economic disadvantage. The EqIA component of the ISA will holistically assess the likely effects on characteristics of equality, social inclusion and population and are therefore reflected within ISA Objectives in the ISA Framework (**Table 5.2** below). At this point, due to the nature of the LDP Review, the identification of specific impacts on marriage, civil partnership and gender reassignment have been scoped out from the application of the Public Sector Equality Duty as the LDP Review cannot realistically secure objectives in relation to these protected characteristics.
- 5.4.15. To avoid duplication or assessment gaps (including in combination with the WBFGA), the integrated approach outlined in the 'A More Equal Wales – Mapping the Duties' non-statutory guidance (2021) will be adopted in this ISA. Relevant evidence generated through applying the ISA Framework to all emerging substantive plan components will therefore be used to support specific reporting against the distinct requirements of each duty.

#### **Health Impact Assessment**

- 5.4.16. The purpose of HIA is to consider how a plan, programme or proposal will affect the key factors which can influence people's health and wellbeing. The HIA approach is particularly concerned with the distribution of effects within a population, as different groups are likely to be affected in different ways, and therefore how health and social inequalities might be reduced or widened by particular proposals. More widely it should be recognised that an individual's inherited traits interact with lifestyle, community, environmental, social and economic factors as well as a much wider range of issues to determine their health.

- 5.4.17. The WBFGA aims to achieve ‘a healthier Wales’, and the planning system is key to ensuring places support the health and wellbeing of people and communities. The NPT Well-being Plan (2018-2025) has identified health improvement as a key priority. Clearly, within national and local policy, there is an increasing awareness of the links between the character and quality of the places where people live and work and their health and wellbeing. Social and economic factors are typically the main determinants of health, although the provision of health services and environmental factors such as pollution control and better design can play an important role. The legal and policy context should direct the RLDP towards better health outcomes. The Environment (Wales) Act has set stronger carbon reduction targets and the HIA and ISA should help to ensure that greener, healthier places and ways of living are achieved.
- 5.4.18. The HIA process provides a systematic, yet flexible and practical, framework that can be used to consider the wider effects of local and national policies or initiatives and how they, in turn, may affect people’s health. The SEA Regulations require human health to be considered as part of the assessment of environmental effects. The health component of an SEA can be broadened to include both physical and mental health objectives of an HIA.
- 5.4.19. Public Health Wales has published ‘Creating healthier places and spaces for our present and future generations’ (2018) which focuses on six priority areas:
- The walking and cycling infrastructure;
  - Open green /blue spaces and green infrastructure ;
  - The food growing and retail environment community;
  - Health and social care services provided from local facilities;
  - Low levels of air pollution; and,
  - Building design.

5.4.20. The HIA element of this ISA will be undertaken firstly by assessing the performance of the emerging RLDP against objectives from the ISA Framework relating to health and wellbeing. Building on this, a second level of assessment will consider the likely impacts of the emerging RLDP as a whole specifically on identified key determinants of health within NPT, taking account of the identified six priority areas.

### **Welsh Language**

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

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

5.4.22. As noted in Section 1, a separate HRA will be undertaken to assess the likely effects of the emerging RLDP on Natura 2000 sites ('European Sites'). There are three European Sites within NPT, with a further three European Sites within 15km of NPT which have the potential to be affected by the emerging RLDP proposals. Full details of all international, national or local designations are provided in Appendix A. The European sites which will be considered in the assessment are:

- Within NPT: Kenfig / Cynffig (SAC), Crymlyn Bog / Cors Crymlyn (SAC & Ramsar Site) and Coedydd Nedd a Mellte (SAC); and,
- Outside NPT: Cefn Cribwr Grasslands (SAC), Blaen Cynon (SAC) and Cwn Calan (SAC).

## 5.5. Proposed NPT LDP Review ISA Objectives

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

**Table 5.2: Proposed ISA Objectives for the LDP Review**

No.	Proposed ISA Objective Topic	Proposed ISA Objective
1	Health and Wellbeing	Improve the health and wellbeing of the population, including with respect to physical and mental health, social wellbeing and community safety.
2	Equality and Social Inclusion	Reduce poverty and inequalities, advance equality of opportunity, reduce socio-economic disadvantage, tackle social exclusion and promote community cohesion.
3	Transport and Communications	Enhance the accessibility of public services, economic opportunities and markets through improving infrastructure and creating a sustainable transport network, whilst also ensuring access to high quality communications and utilities.
4	Inclusive Economic Growth	Increase the number and quality of employment opportunities and improve educational and skill levels while maximising the economic contribution of the NPTC area to the Swansea Bay City Region, including through diversifying and strengthening the local economic base
5	Housing	Provide a sufficient quantum and range of good quality and affordable housing in sustainable locations to meet identified local needs.

No.	Proposed ISA Objective Topic	Proposed ISA Objective
6	Air Quality	Prevent and reduce emissions and concentrations of harmful atmospheric pollutants and minimise exposure to poor air quality.
7	Climate Change	Adopt appropriate mitigation and adaption measures to reduce and respond to the impacts of climate change.
8	Biodiversity, Geodiversity and Soil	Conserve, protect and enhance biodiversity and geodiversity interests, including through safeguarding important sites and species, improving green infrastructure provision and safeguarding important soil resources.
9	Water and Flood Risk	Conserve, protect and enhance water and coastal environments, water quality and water resources, whilst reducing the risk of flooding.
10	Materials and Waste	Contribute to the implementation of the circular economy, manage waste with minimal environmental impacts and ensure the sustainable use of natural resources, including for energy generation and the provision of an adequate supply of minerals and materials for construction.

<b>No.</b>	<b>Proposed ISA Objective Topic</b>	<b>Proposed ISA Objective</b>
11	Sustainable Placemaking	Maximise the efficient use of land and enhance design quality to create great places for people.
12	Cultural Heritage (inc. Welsh Language)	Conserve, protect and enhance the historic environment and cultural assets, including the use of the Welsh language.
13	Landscape	Protect and enhance the landscape character, visual amenity, distinctive sense of place and legibility of settlements in NPT.

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

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

<b>Proposed ISA Objective</b>	<b>SA / SEA Topic(s) as per SEA Regulations – Schedule 2</b>	<b>Relates to Equality Act 2010 - Public Sector Equality and Socio-economic Duties</b>	<b>Relates to WBFGA 2015</b>	<b>Relates to HIA</b>	<b>Relates to Welsh Language (Planning Wales Act 2015)</b>
1. Health and Wellbeing: Improve the health and wellbeing of the population, including with respect to physical and mental health, social wellbeing and community safety.	B, C	Yes	Yes	Yes	
2. Equality and Social Inclusion: Reduce poverty and inequalities, advance equality of opportunity, reduce socio-economic disadvantage, tackle social exclusion and promote community cohesion.	B, J	Yes - directly	Yes	Yes	Yes
3. Transport and Communications: Enhance the accessibility of public services, economic opportunities and markets	B, I, J	Yes	Yes		

Proposed ISA Objective	SA / SEA Topic(s) as per SEA Regulations – Schedule 2	Relates to Equality Act 2010 - Public Sector Equality and Socio-economic Duties	Relates to WBFGA 2015	Relates to HIA	Relates to Welsh Language (Planning Wales Act 2015)
through improving infrastructure and creating a sustainable transport network, whilst also ensuring access to high quality communications and utilities.					
4. Inclusive Economic Growth: Increase the number and quality of employment opportunities and improve educational and skill levels while maximising the economic contribution of NPT to the Swansea Bay City Region, including through diversifying and strengthening the local economic base	B, J	Yes	Yes		Yes?
5. Housing: Provide a sufficient quantum and range of good quality and affordable	B, J, C	Yes	Yes	Yes	Yes?

Proposed ISA Objective	SA / SEA Topic(s) as per SEA Regulations – Schedule 2	Relates to Equality Act 2010 - Public Sector Equality and Socio-economic Duties	Relates to WBFGA 2015	Relates to HIA	Relates to Welsh Language (Planning Wales Act 2015)
housing in sustainable locations to meet identified local needs.					
6. Air Quality: Prevent and reduce emissions and concentrations of harmful atmospheric pollutants and minimise exposure to poor air quality.	H, C	Yes	Yes	Yes	
7. Climate Change: Adopt appropriate mitigation and adaption measures to reduce and respond to the impacts of climate change.	I		Yes		
8. Biodiversity, Geodiversity and Soil: Conserve, protect and enhance biodiversity and geodiversity interests, including through	A, D, E, F		Yes		

Proposed ISA Objective	SA / SEA Topic(s) as per SEA Regulations – Schedule 2	Relates to Equality Act 2010 - Public Sector Equality and Socio-economic Duties	Relates to WBFGA 2015	Relates to HIA	Relates to Welsh Language (Planning Wales Act 2015)
safeguarding important sites and species, improving green infrastructure provision and safeguarding important soil resources.					
9. Water and Flood Risk: Conserve, protect and enhance water and coastal environments, water quality and water resources, whilst reducing the risk of flooding.	G		Yes	Yes	
10. Material assets and Waste: Contribute to the implementation of the circular economy, manage waste with minimal environmental impacts and ensure the sustainable use of natural resources, including for energy generation and providing an adequate	F, J		Yes		

Proposed ISA Objective	SA / SEA Topic(s) as per SEA Regulations – Schedule 2	Relates to Equality Act 2010 - Public Sector Equality and Socio-economic Duties	Relates to WBFGA 2015	Relates to HIA	Relates to Welsh Language (Planning Wales Act 2015)
supply of minerals and materials for construction.					
11. Sustainable Placemaking: Maximise the efficient use of land and enhance design quality to create great places for people.	B, J, L	Yes	Yes	Yes	
12. Cultural Heritage and Welsh Language: Conserve, protect and enhance the historic environment and cultural assets, including the use of the Welsh language.	B, K		Yes		Yes
13. Protect and enhance the landscape character, visual amenity, distinctive sense of place and legibility of settlements in NPT.	B, L				

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

## 5.6. Proposed ISA Framework for the NPT LDP Review

5.5.5. To enable this ISA to be undertaken in a proportionate and targeted manner an ISA Framework will be used, comprising:

- The proposed ISA Objectives (see **Table 5.2**);
- A suite of relevant Guide Questions relating to each ISA Objective. Subject to views expressed by the relevant Consultation Bodies, this will be used in a qualitative assessment of each emerging substantive component of the RLDP, and any identified reasonable alternatives, to proportionately identify their LSE; and,
- A suite of sustainability indicators which are proposed to be considered in the assessment of candidate sites being carried out by NPTC. These indicators are designed to guide NPTC in the site assessment process. The indicators will support a legally compliant ISA that identifies statutory impacts assessment requirements. An integrated site selection and ISA site assessment process will be possible through the framework to avoid assessment duplication.–These are detailed in **Table 5.4 and Appendix C.**

5.5.6. The proposed ISA Framework is detailed in **Table 5.4** below. During the assessment stage of the ISA, in accordance with the SEA Regulations a further suite of indicators will be developed to provide a framework for monitoring the likely significant effects on the environment (including social, economic, cultural factors), Welsh language, health, wellbeing, of implementing a RLDP once adopted. This monitoring framework will also be used by NPTC to monitor the effectiveness of the RLDP and to assess whether key targets of the RDLP are being met.

**Table 5.4: Proposed ISA Framework for the LDP Review**

Proposed SA Objectives	Proposed SA Guide Questions – <i>Will the RLDP...</i>	Proposed Sustainability Indicators for Candidate Site Assessments
<p>1. Health and Wellbeing: Improve the health and wellbeing of the population, including with respect to physical and mental health, social wellbeing and community safety.</p>	<p>Protect and improve access to healthcare services and facilities?</p> <p>Reduce health inequalities and improve the physical and mental health and wellbeing of communities?</p> <p>Improve accessibility to green active travel routes, high quality accessible recreational open spaces and sports facilities, in particular for those facing structural inequalities and/or socio-economic disadvantage?</p> <p>Facilitate or encourage active travel for all communities?</p> <p>Increase access to nature?</p> <p>Provide clean air and high- quality bathing beaches and rivers?</p>	<p>Proximity to existing active travel networks;</p> <p>Proximity to Health Facilities</p> <p>Proximity of New Health Facilities and/or Active Travel Routes</p>

Proposed SA Objectives	Proposed SA Guide Questions – <i>Will the RLDP...</i>	Proposed Sustainability Indicators for Candidate Site Assessments
	<p>Protect against noise pollution, delivering context appropriate soundscapes?</p> <p>Protect communities from environmental risks such as flooding using nature-based solutions?</p> <p>Protect against light pollution?</p> <p>Create urban communities that feature a network of high quality, well connected green infrastructure?</p>	
<p>2. Equality and Social Inclusion: Reduce poverty and inequalities, advance equality of opportunity, reduce socio-economic disadvantage, tackle social</p>	<p>Reduce poverty and social exclusion?</p> <p>Result in differential impacts (beneficial or adverse) on different demographic groups or persons with protected characteristics?</p> <p>Result in differential impacts (beneficial or adverse) on communities (of place or interest) facing inequality of outcome due to socio-economic disadvantage?</p>	<p>Proximity to Community Facilities/ Public Services</p> <p>Provision of New Community Facilities/ Services</p>

Proposed SA Objectives	Proposed SA Guide Questions – <i>Will the RLDP...</i>	Proposed Sustainability Indicators for Candidate Site Assessments
<p>exclusion and promote community cohesion.</p>	<p>Result in differential impacts (beneficial or adverse) on individuals vulnerable to social exclusion or poverty?</p> <p>Provide fair and impartial protection from environmental hazards (such as air quality, flooding)?</p> <p>Protect and enhance access to high quality community facilities, public services and key amenities to meet the diverse needs of different demographic groups, vulnerable members of the community and those facing socio-economic disadvantage?</p> <p>Protect and enhance access to natural resources, including good quality public green and blue spaces?</p> <p>Help to reduce levels of absolute and relative income poverty, inequality in the distribution of household wealth, and levels of multiple deprivation affecting communities?</p> <p>Promote social cohesion and integration?</p>	

Proposed SA Objectives	Proposed SA Guide Questions – <i>Will the RLDP...</i>	Proposed Sustainability Indicators for Candidate Site Assessments
	Reduce fuel poverty?	
<p>3. Transport and Communications: Enhance the accessibility of public services, economic opportunities and markets through improving infrastructure and creating a sustainable transport network, whilst also ensuring access to high quality</p>	<p>Increase the accessibility of public services, economic opportunities and markets?</p> <p>Improve connectivity within the NPTC area and to other areas?</p> <p>Reduce car dependencies and encourage a shift to more sustainable forms of travel, including for people and freight?</p> <p>Support the increased uptake of active travel by providing integrated active travel routes?</p> <p>Improve the accessibility, capacity and safety of the transport network?</p> <p>Reduce traffic flows and congestion?</p> <p>Enhance the quality and integration of public transport?</p>	<p>Proximity to the public transport network (bus stops and train stations);</p> <p>Proximity to the strategic road network (motorways and trunk roads);</p> <p>Proximity to existing active travel networks;</p> <p>Proximity to congestion pinch points;</p> <p>Availability and the capacity of Transport &amp; Utilities infrastructure (Water and Sewage);</p> <p>Drainage Management and Site Capacity; and</p> <p>Provision of New/ Upgraded Transport or Communications Infrastructure</p>

Proposed SA Objectives	Proposed SA Guide Questions – <i>Will the RLDP...</i>	Proposed Sustainability Indicators for Candidate Site Assessments
communications and utilities.	<p>Enhance the provision of high-quality communications infrastructure?</p> <p>Improve utilities infrastructure to support economic growth and meet population needs?</p>	
4. Inclusive Economic Growth: Increase the number and quality of employment opportunities and improve educational and skill levels while maximising the economic contribution of NPT	<p>Enhance access to and diversify employment opportunities for local residents?</p> <p>Provide equal access to high equality employment opportunities, social and cultural activities, and public services and amenities for all?</p> <p>Improve access to employment for all demographic groups and communities, in particular for those facing structural inequalities and/or socio-economic disadvantage?</p> <p>Enhance opportunities for education, lifelong learning and the retention of skills within the local economy?</p>	<p>Employment capacity</p> <p>Mixed use Suitability;</p> <p>Proximity to key employment locations;</p> <p>Proximity to Primary Education Infrastructure;</p> <p>Proximity to Secondary Education Infrastructure;</p> <p>Education Infrastructure Capacity;</p> <p>Provision of New Education Infrastructure;</p> <p>Suitability of Industrial / Economic Use;</p> <p>Neighbouring Uses &amp; Potential Agglomeration Effects; and</p>

Proposed SA Objectives	Proposed SA Guide Questions – <i>Will the RLDP...</i>	Proposed Sustainability Indicators for Candidate Site Assessments
<p>to the Swansea Bay City Region, including through diversifying and strengthening the local economic base.</p>	<p>Support the growth of further and higher education institutions?</p> <p>Deliver the right type of development and economic activities in the accessible locations to maximise economic competitiveness?</p> <p>Help to diversify and regenerate the local economy?</p> <p>Encourage inward investment and innovation?</p> <p>Promote the co-location of synergistic economic activities, industries and land uses?</p> <p>Support social and environmental wellbeing in NPTC and beyond.</p> <p>Provide the infrastructure and workspace required for new and existing businesses?</p> <p>Promote the principles of green recovery?</p>	<p>Proximity to Strategic Road and Rail Network</p>

Proposed SA Objectives	Proposed SA Guide Questions – <i>Will the RLDP...</i>	Proposed Sustainability Indicators for Candidate Site Assessments
	<p>Support the aims of the Swansea Bay City Region City Deal, including enhanced digital connectivity?</p> <p>Promote the sustainable use and consumption of natural resources (eg utilising the DISRUPT Framework)?</p>	
<p>5. Housing: Provide a sufficient quantum and range of good quality and affordable housing in sustainable locations to meet identified local needs.</p>	<p>Help to facilitate the increased delivery of housing to meet a range of identified needs?</p> <p>Improve the quality of the housing stock?</p> <p>Provide energy efficient housing stock which operates at close to zero emissions?</p> <p>Reduce homelessness and overcrowding?</p> <p>Increase the mix, range and affordability of housing?</p> <p>Provide housing that encourages a sense of community?</p>	<p>Housing capacity of the site;</p> <p>Deliverability of affordable housing;</p> <p>Mixed Use Suitability;</p> <p>Neighbouring Uses;</p> <p>Proximity to COMAH (control of major accident hazards) sites; and</p> <p>Proximity to Sites Designated in National Site Network (vulnerable to recreational pressures)</p>

Proposed SA Objectives	Proposed SA Guide Questions – <i>Will the RLDP...</i>	Proposed Sustainability Indicators for Candidate Site Assessments
	<p>Delivery adequate pitches and plots required for Gypsies, Travellers and Travelling Show people?</p> <p>Maximise benefits of new development using appropriate housing locations and good design?</p>	
<p>6. Air Quality: Prevent and reduce emissions and concentrations of harmful atmospheric pollutants and minimise exposure to poor air quality.</p>	<p>Maintain or improve air quality?</p> <p>Reduce exposure to poor air quality?</p> <p>Prevent and reduce emissions of harmful pollutants?</p> <p>Prevent and reduce poor air quality which is in proximity to international, national and local level for reasons of biodiversity, conservation, ecological or geological importance?</p>	<p>Proximity to AQMA;</p> <p>Proximity to congestion pinch points; and</p> <p>Potential operational emissions.</p>
<p>7. Climate Change: Adopt appropriate</p>	<p>Help to reduce greenhouse gas (GHG) emissions from key economic sectors?</p>	<p>On-site provision of low / zero carbon energy generation;</p>

Proposed SA Objectives	Proposed SA Guide Questions – <i>Will the RLDP...</i>	Proposed Sustainability Indicators for Candidate Site Assessments
<p>mitigation and adaption measures to reduce and respond to the impacts of climate change.</p>	<p>Support the minimisation of energy use?</p> <p>Support the delivery of renewable and low carbon energy and reduce dependency on non-renewable sources?</p> <p>Facilitate investment in and promote the use of low carbon and sustainable infrastructure?</p> <p>Implement adaptation measures to address the likely effects of climate change, including increased flood risks?</p> <p>Promote sustainable design that minimises GHG emissions and is adaptable to the effects of climate change?</p> <p>Restore or create a network of natural carbon capture environments including peatlands, grasslands, woodlands and within ‘blue carbon’ sinks?</p>	<p>Proximity to the public transport network; and</p> <p>Incorporation of Climate Change Adaptation Measures.</p>

Proposed SA Objectives	Proposed SA Guide Questions – <i>Will the RLDP...</i>	Proposed Sustainability Indicators for Candidate Site Assessments
<p>8. Biodiversity, Geodiversity and Soil: Conserve, protect and enhance biodiversity and geodiversity interests, including through safeguarding important sites and species, improving green infrastructure provision and safeguarding important soil resources.</p>	<p>Ensure appropriate safeguards for the integrity and conservation objectives of sites designated at international, national or local levels for reasons of biodiversity or geodiversity value or species protection?</p> <p>Protect and enhance valued species and habitats?</p> <p>Safeguard Resilient Ecological Networks (RENs)?</p> <p>Safeguard against habitat loss or fragmentation?</p> <p>Maintain and enhance urban green infrastructure?</p> <p>Protect or enhance protected trees or important woodland areas?</p> <p>Improve access to nature?</p> <p>Remediate known contamination of land and groundwater?</p> <p>Safeguard the best quality and locally important agricultural land?</p>	<p>Proximity to National Site Network Sites (SAC/SPA)</p> <p>Proximity to SSSI;</p> <p>Proximity to ancient woodlands;</p> <p>Proximity to NNR;</p> <p>Proximity to RIGS;</p> <p>Proximity to LWS/SINC/LNR;</p> <p>Potential Effects on Designated Sites;</p> <p>Presence of Important Trees, Hedgerows or Tree Protection Orders (TPOs)?</p> <p>Presence of Valued Habitats and Species;</p> <p>Standardised Ecological Summary (incorporating NRW Scoring &amp; other information); and</p> <p>Agricultural land classification.</p>

Proposed SA Objectives	Proposed SA Guide Questions – <i>Will the RLDP...</i>	Proposed Sustainability Indicators for Candidate Site Assessments
	<p>Protect and enhance important soil resources?</p> <p>Outline more direct consideration/reference to the condition of designated sites?</p> <p>Provide a clearer definition of ‘valued’ habitats and species.</p> <p>Provide a means for assessment of green infrastructure?</p>	
<p>9. Water and Flood Risk: Conserve, protect and enhance water and coastal environments, water quality and water resources,</p>	<p>Improve the quality of waterbodies helping to meet the objectives of the Water Framework Directive?</p> <p>Maintain or enhance the ecological and chemical status of the water environment?</p> <p>Affect the volume of surface water runoff into or abstraction from water bodies?</p> <p>Provide a means to assess the condition of waterbodies and degree of physical modification (WFD)?</p>	<p>Proximity to Flood Risk Zones;</p> <p>Proximity to Main Rivers and Lakes, and Utilities Capacity (Power, Water Supply and Drainage).</p>

Proposed SA Objectives	Proposed SA Guide Questions – <i>Will the RLDP...</i>	Proposed Sustainability Indicators for Candidate Site Assessments
<p>whilst reducing the risk of flooding.</p>	<p>Protect and assess the number of properties at risk from flooding (taking account of the climate change scenarios outlined in the new Flood Map Wales)?</p> <p>Support improvements to water infrastructure (water supply and sewerage)?</p> <p>Minimise the risk of flooding from all sources of flooding to all people, property, infrastructure and environmental assets?</p> <p>Manage residual flood risks appropriately and avoid new flood risks?</p> <p>Review average water usage per household?</p> <p>Avoid new development in areas prone to flood risk or mitigate the potential for such risk?</p>	

Proposed SA Objectives	Proposed SA Guide Questions – <i>Will the RLDP...</i>	Proposed Sustainability Indicators for Candidate Site Assessments
	<p>Promote the deployment of sustainable urban drainage systems and promote nature-based solutions for better management of surface water?</p> <p>Maintain and restore natural river processes to safeguard river habitats and help to mitigate the effects of climate change including flooding and droughts?</p> <p>Conserve water resources and promote water efficiency?</p>	
<p>10. Material assets and Waste: Contribute to the implementation of the circular economy, manage waste with minimal</p>	<p>Minimise the production of waste?</p> <p>Promote the principles of circular economy?</p> <p>Treat and process waste with minimal environmental impact?</p> <p>Minimise the demand for raw materials and the need for minerals extraction?</p>	<p>Proximity to Community Recycling Centres, and Locational need for minerals extraction.</p>

Proposed SA Objectives	Proposed SA Guide Questions – <i>Will the RLDP...</i>	Proposed Sustainability Indicators for Candidate Site Assessments
<p>environmental impacts and ensure the sustainable use of natural resources, including for energy generation and providing an adequate supply of minerals and materials for construction.</p>	<p>Promote the use of local resources and minimise the importation of minerals?</p>	
<p>11. Sustainable Placemaking: Maximise the efficient use of land and enhance</p>	<p>Promote high quality architecture and design which strengthens local distinctiveness, linked to historic and cultural protections, and fosters a sense of place?</p>	<p>Previously Developed Land or Greenfield Land, and Proximity to existing active travel networks.</p>

Proposed SA Objectives	Proposed SA Guide Questions – <i>Will the RLDP...</i>	Proposed Sustainability Indicators for Candidate Site Assessments
<p>design quality to create great places for people.</p>	<p>Create and maintain a safe and attractive public realm which encourages people to walk and cycle?</p> <p>Ensure appropriate siting, scale, massing and density of development?</p> <p>Make the best use of land, including through prioritising the redevelopment of brownfield sites and locating high footfall uses close to the public transport network?</p> <p>Reduce opportunities for crime and antisocial behaviour through the siting and design of new development?</p> <p>Provide public realm which feels safe to all users at all times?</p> <p>Consider nature-based solutions in sustainable placemaking?</p> <p>Make space for and integrate green infrastructure as intrinsic part of design and function of new places?</p>	

Proposed SA Objectives	Proposed SA Guide Questions – <i>Will the RLDP...</i>	Proposed Sustainability Indicators for Candidate Site Assessments
	Facilitate well connected spaces for people and nature?	
<p>12. Cultural Heritage and Welsh Language: Conserve, protect and enhance the historic environment and cultural assets, including the use of the Welsh language.</p>	<p>Increase availability and accessibility of culture, leisure and recreation activities/venues?</p> <p>Conserve, protect and enhance the integrity, character and setting of historic assets?</p> <p>Protect and enhance the qualities of areas of historical or cultural significance?</p> <p>Promote the sensitive re-use of historic or culturally important buildings?</p> <p>Preserve and, where appropriate, enhance important archaeological resources?</p> <p>Safeguard and increase the use of the Welsh language?</p>	<p>Proximity to Scheduled Monuments;</p> <p>Proximity to Listed Buildings;</p> <p>Impacts on Important Archaeological Site;</p> <p>Effect on Designated Sites;</p> <p>Re-Use of Historic or Culturally Important Buildings; and</p> <p>Effect on Welsh Language.</p>

Proposed SA Objectives	Proposed SA Guide Questions – <i>Will the RLDP...</i>	Proposed Sustainability Indicators for Candidate Site Assessments
<p>13. Landscape: Protect and enhance the landscape character, visual amenity and legibility of settlements in NPT.</p>	<p>Protect and enhance landscape character, local distinctiveness and sense of place? Safeguard important landscape and townscape features? Protect visual amenity and valued views? Prevent urban sprawl?</p>	<p>Proximity to SLA or Heritage Coast; Proximity to Brecon Beacons National Park Boundary/ Dark Skies Area; Visual Amenity Impacts; Individual Site Integration/ Coalescence/ Separation Impact; and Spatial Development Effect (incl. cumulative impact).</p>

## 6 Proposed ISA Methodology and Consultations Arrangements

### 6.1. Introduction

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

### 6.2. Proposed ISA Reporting

#### Overview

- 6.2.1. Based on the intended form of the LDP Review (Section 2) it is envisaged that the ISA Framework set out in **Table 5.4** will be used to assess all proposed substantive components of the RLDP as it emerges, as well as any identified reasonable alternatives to these proposals. In general terms, the ISA will therefore need to include appraisals of a proposed RLDP vision, RLDP objectives, a spatial strategy (and potential sub-area strategies), strategic policies, development management policies and site allocations. The proposed approach to undertaking a proportionate ISA of each of these components is set out in this section.
- 6.2.2. As described in Section 5.4, the assessment methodology comprises a two-stage approach at both LDP Pre-Deposit and Deposit stages. The Framework will be applied as the main, base-level, assessment considering all likely effects on a thematic basis to provide a holistic assessment of the

sustainability implications of the emerging RLDP. The second level of assessment will be reporting against the specific requirements of applicable duties and requirements (e.g. Public Sector Equality and Socio-economic Duties for EqIA). This will draw upon the findings of the ISA Framework assessment. The secondary level of assessment will take the form of a series of commentaries to report conclusions against WBFGA 2015, Equality Act 2010, Welsh language, and HIA requirements in turn.

- 6.2.3. The ISA methodology will be applied, and the findings reported within iterative ISA Reports which will be prepared in accordance with applicable statutory requirements to accompany the Preferred Strategy (RLDP Pre-Deposit Document) and RLDP Deposit Plan (Deposit Document). The ISA Report will be updated and expanded between these stages to reflect changes to the emerging LDP:
- 1 The ISA Report for the Preferred Strategy will focus on assessing effects from proposed RLDP options (including growth levels), spatial strategy (including key sites which underpin the strategy) and strategic policies; and,
  - 2 The ISA Report for the RLDP Deposit Plan will identify and assess effects from all substantive components of the RLDP Deposit Plan, including all proposed site allocations and policies.
- 6.2.4. All matrix-based detailed assessments of individual components of the emerging RLDP will be contained within appendices to the ISA report, with key findings set out within the main body of the report. In accordance with the SEA Regulations, and other relevant best practice, a separate Non-Technical Summary (NTS) document will be prepared to provide the information prescribed within Schedule 2 of the SEA Regulations and present the key findings of the ISA, incorporating SEA, in non-technical language.
- 6.2.5. Following the completion of an independent examination of RLDP Deposit Plan, all binding recommendations made by the appointed Inspector will be subject to ISA screening to determine whether they would give rise to any new or different likely significant effects (including on the environment) not

previously reported within the ISA Report for the RLDP Deposit Plan. This ISA Screening will be documented within an ISA Report Addendum.

### **6.3. Proposed ISA Methodology**

#### **ISA of Vision and Objectives**

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

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

ISA Objective	RLDP Vision	RLDP Objective 1	RLDP Objective 2	Etc.
<p>1. Health and Wellbeing: Improve the health and wellbeing of the population, including with respect to physical and mental health, social wellbeing and community safety, including through context appropriate soundscapes and reductions in addressing light pollution.</p>				
<p>2. Equality and Social Inclusion: Reduce poverty and inequalities, advance equality of opportunity, reduce socio-economic disadvantage, tackle social exclusion and promote community cohesion.</p>				
<p>3. Transport and Communications: Enhance the accessibility of public services,</p>				

ISA Objective	RLDP Vision	RLDP Objective 1	RLDP Objective 2	Etc.
<p>economic opportunities and markets through improving infrastructure and creating a sustainable transport network, whilst also ensuring access to high quality communications and utilities.</p>				
<p>4. Inclusive Economic Growth: Increase the number and quality of employment opportunities and improve educational and skill levels while maximising the economic contribution of NPT to the Swansea Bay City Region, including through diversifying and strengthening the local economic base.</p>				
<p>5. Housing: Provide a sufficient quantum and range of good quality and affordable</p>				

ISA Objective	RLDP Vision	RLDP Objective 1	RLDP Objective 2	Etc.
housing in sustainable locations to meet identified needs.				

**Figure 2: Key**

RLDP Vision	RLDP Objective 1	RLDP Objective 2	Etc.
+	Compatible		
0	Neutral		
?	Uncertain		
-	Incompatible		
~	No Clear Relationship		

## 6.4. ISA of Proposed Spatial Strategies and Policies

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

**Table 6.2: Proposed Scoring System - Spatial Strategies and Policies**

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

6.4.4. The findings of the assessment will be presented within the ISA Report using matrices similar to that shown in **Table 6.3** (the example policy grouping and

titles are indicative and may be subject to change). In accordance with statutory requirements, each matrix will include a commentary to:

- Justify the assessment scoring for each assessed policy;
- Identify any likely significant environmental or other effects within the context of the SEA Regulations and other applicable statutory requirements;
- Identify any likely different or disproportionate effects on demographic groups with protected characteristics or those vulnerable to social exclusion or poverty; and,
- Identify any mitigation or enhancement measures considered necessary to either avoid significant adverse environmental and other effects (which would otherwise be expected to occur) or to enhance the performance of the proposed policies.

6.4.5. For brevity and formatting reasons it is not proposed to reproduce the Guide Questions associated with each ISA Objective (see **Table 5.4**) within the final version of these matrices in the ISA Report. However, the questions will be used to undertake this assessment and the ISA Framework will be appended to the RLDP ISA Report in full.

6.4.6. Building on the ISA Framework (level 1 assessment) matrices, a second level assessment will comprise short commentaries to demonstrate the relevance and appropriateness of the proposed spatial strategy and policy framework to address WBFGA 2015, Equality Act 2010, Welsh language, and HIA requirements in turn.

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

Example Policy Grouping: Placemaking

ISA Objective	Policy 1 Score	Policy 2 Score	Policy 3 Score	Commentary
<p>1. Health and Wellbeing: Improve the health and wellbeing of the population, including with respect to physical and mental health, social wellbeing and community safety, including through context appropriate soundscapes and reductions in addressing light pollution.</p>	++	+	++	<p><u>Assessment of Predicted Effects</u></p> <p><u>Mitigation and Enhancement</u></p> <p><u>Assumptions</u></p> <p><u>Uncertainties</u></p>

ISA Objective	Policy 1 Score	Policy 2 Score	Policy 3 Score	Commentary
<p>2. Equality and Social Inclusion: Reduce poverty and inequalities, advance equality of opportunity, reduce socio-economic disadvantage, tackle social exclusion and promote community cohesion.</p>	+	-	--	<p><u>Assessment of Predicted Effects</u></p> <p><u>Mitigation and Enhancement</u></p> <p><u>Assumptions</u></p> <p><u>Uncertainties</u></p>
<p>3. Transport and Communications: Enhance the accessibility of public services, economic opportunities and markets through improving infrastructure and creating a sustainable transport</p>	-	~	?	<p><u>Assessment of Predicted Effects</u></p>

ISA Objective	Policy 1 Score	Policy 2 Score	Policy 3 Score	Commentary
network, whilst also ensuring access to high quality communications and utilities.				<u>Mitigation and Enhancement</u>  <u>Assumptions</u>  <u>Uncertainties</u>
Etc.				

## 6.5. ISA of Candidate Site Allocations

- 6.5.1. As noted in Section 5, an integrated site assessment process will be carried out by NPTC to satisfy ISA requirements (including SEA) and to select site allocations for inclusion in the RLDP. This will identify the strategic sites needed to deliver the RLDP Preferred Strategy.
- 6.5.2. Owing to the strategic level and nature of the candidate site allocations that are likely to be included within the LDP Pre-Deposit Document, it may in some cases be necessary to adopt the same approach as for the LDP proposed spatial strategies and policies (**Table 6.3**) in terms of focusing on their compatibility with the ISA Framework. However, the ISA will seek to identify site-specific and relevant sustainability issues, disproportionate effects on groups with protected characteristics, those vulnerable to social exclusion or poverty and those facing socio-economic disadvantage, and appropriate mitigation or enhancement measures which should be incorporated within candidate strategic site allocations as they are developed further for the RLDP Deposit Document. Where possible, the ISA of the candidate strategic site allocations will determine whether they are likely to result in any significant effects.
- 6.5.3. The assessment criteria used by NPTC will relate to the sustainability indicators listed in the third column on **Table 5.4** and thus will relate to each of the ISA Objectives within the ISA Framework. The ISA Reports accompanying the LDP Pre-Deposit and LDP Deposit Documents will demonstrate that the site assessment criteria and process adopted by NPTC satisfy statutory ISA requirements and sufficiently relate to the ISA Objectives identified within the ISA Framework for the LDP Review.
- 6.5.4. The Call for Candidate Sites is the first formal stage in the preparatory stages of the RLDP following the agreement and publication of the DA. Through the Call for Candidate Sites, the Council will invite developers, landowners, site promoters, public bodies, service providers and others with an interest in land to

submit sites which they wish to be considered as a potential allocation for either development or protection<sup>4</sup>.

- 6.5.5. Following the submission of sites and closure of the Call for Candidate Sites, the Council will prepare a Candidate Sites Register.
- 6.5.6. The Council will then undertake a Stage 1 Initial Candidate Sites Assessment with the following three stage desk-based assessment of all submitted sites: (1) Site Size Filter; (2) Fundamental Constraints Filter and (3) Deliverability Filter. GIS software will be used to filter sites according to whether they have any of the fundamental constraints. If the constraint forms part of the site boundary, further consideration will be given as to whether the impact of the development could be mitigated. A summary of the findings will be reported in the Candidate Sites Register published as part of the Preferred Strategy consultation.
- 6.5.7. A Stage 2 Candidate Sites Assessment will be undertaken of all filtered sites. The Stage 2 Candidate Sites Assessment will involve (1) Viability appraisal; (2) ISA assessment (qualitative and quantitative) and Candidate Site Suitability assessment; and (3) Engagement with infrastructure providers. The Council will review the information submitted and initially complete a high-level review of the appropriateness of the information submitted, using the agreed regional Candidate Site Financial Viability Appraisal High-Level Review. Afterwards, the Council will then undertake detailed ISA and Candidate Site Suitability Assessment of all filtered sites. Finally, the Council will engage with the infrastructure providers to identify infrastructure constraints. A summary of the findings will be reported in the Candidate Sites Register published as part of the Preferred Strategy consultation.
- 6.5.8. Following the Preferred Strategy consultation, the Council will:
  - Consider representations received (including those promoting new sites and those commenting on the Tests of Soundness);

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<sup>4</sup> Given that the Council has already undertaken a Call for Sites, the Council has already obtained a number of sites for promotion. These sites will not need to be re-submitted. More information will be made available at the time of the Call and in Candidate Sites Assessment Methodology published prior to the Call.

- Review Stage 1 and Stage 2 assessments of newly submitted sites and sites for which additional information has been received;
- Update and re-publish the Candidate Sites Register to detail additional sites submitted and additional information submitted;
- Undertake further ISA and Candidate Site Suitability Assessment where required
- Identify sites to be allocated in the Deposit Plan;
- Prepare final site allocations; and
- Prepare the Initial Consultation Report which will include a schedule of individual site related comments and suggestions for new site allocations.

6.5.9. At both LDP Pre-Deposit and Deposit stages a second level qualitative assessment will also be undertaken to test the ability of all identified reasonable alternative sites at each stage, and at Deposit stage of the combined suite of proposed site allocations, to address WBFGA 2015, Equality Act 2010, Welsh language and HIA requirements.

## **6.6. Assessment of Cumulative Effects and Synergistic Effects**

### **Cumulative and Synergistic Effects**

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

## **6.7. ISA of Reasonable Alternatives**

### **Identification of Reasonable Alternatives**

6.7.1. The SEA Regulations require the LSE of implementing both a plan or programme (i.e. the emerging RLDP) and reasonable alternatives to it to be examined, as well as the rationale for identifying reasonable alternatives to be described. The

SEA Regulations further state that to be considered as reasonable alternatives, options (e.g. alternative policy criteria or site allocations) must relate to the plan or programmes' corresponding objectives and geographical scope. To be eligible for consideration in this ISA process, reasonable alternatives must therefore be:

- Realistic, in that they are plausible alternatives which could be implemented instead of proposals within the emerging RLDP and are consistent with relevant national and other policy frameworks;
- Related to the objectives of the emerging RLDP; and,
- Within the geographical scope of the emerging RLDP, i.e. any reasonable alternatives would need to relate to the distribution or characteristics of future development within NPT.

6.7.2. Given that reasonable alternatives must relate to the objectives of the plan under consideration, it is not likely to be possible to identify any clear reasonable alternatives to the LDP vision and objective, as any alternatives would change the strategic direction of the emerging RLDP. However, the following types of reasonable alternatives will be identified where possible and subject to assessment in the same way as the corresponding preferred option or proposed component of the emerging RLDP:

- Alternative policy options, criteria and tests considered during the preparation of the LDP Pre-Deposit and LDP Deposit Documents, e.g. setting higher or lower housing land requirements (to inform site allocations) or the application of a higher or lower affordable housing provision requirements (to assess planning applications);
- Alternative spatial options considered during the preparation of the LDP Pre-Deposit and LDP Deposit Documents, e.g. directing housing or employment growth to particular locations instead of others; and,
- Alternative site allocations – as noted above, all candidate sites submitted to NPTC during the RLDP Call for Sites period and not discounted due to either deliverability or non-compatibility with the RLDP Preferred Strategy will need to be subject to the same level of ISA, regardless of whether NPTC subsequently decides to allocate the site within the emerging RLDP. To demonstrate

compliance with SEA case law, the ISA Reports for the RLDP Pre-Deposit and Deposit Documents will also provide a summary justification to explain the status of each candidate site (e.g. preferred, reasonable alternative, rejected, etc.) at each stage of the LDP Review.

### **Approach to Identifying Uncertainties, Assumptions and Mitigation**

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

## **6.8. Presentation of ISA Key Findings**

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

## **6.9. Proposed ISA Consultation Arrangements**

6.9.1. Iterative versions of the ISA report will be published to accompany the NPT RLDP Preferred Strategy (Pre-Deposit Document) and NPT Deposit Plan (Deposit Document). Whilst the timetable for consultation on the emerging RLDP will be confirmed in the final DA to be published in November 2023, the draft DA outlines that consultation on the Preferred Strategy will be undertaken from November - December 2024 and from November - December 2025 for the Deposit Plan. each for a period not less than (and likely exceeding) 6 weeks duration. Reflecting the broad scope of this ISA, the ISA Reports will be issued to relevant stakeholders over and above the SEA Consultation Authorities and will be publicly available on the NPTC website. Representations and comments on both the emerging RLDP and associated ISA Reports can be made via the Council's website, email, or postal addresses which will be confirmed prior to the RLDP Preferred Strategy consultation period commencing.

## **7 Summary and Next Steps**

### **7.1. Overview**

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

## Appendix A: Baseline Review

### A.1 Introduction

A.1.1 This Appendix supports Section 4 of the NPT LDP Review ISA Scoping Report. It provides a review of current environmental and socio-economic conditions within the area likely to be affected by the LDP Review, in particular (but not exclusively) the NPTC administrative area.

A.1.2 In doing so this review:

- Identifies relevant baseline characteristics, including those likely to be significantly affected by the outcome of the LDP Review (i.e. the NPT RLDP). This includes the identification of sites designated at international or national levels for reasons of ecological/geological importance or heritage/landscape value which have the potential to be affected by the LDP Review;
- Identifies relevant socio-economic trends and baseline conditions, again focusing on matters likely to be significantly affected by the outcome of the LDP Review (i.e. the NPT RLDP); and,
- Outlines how the identified environmental and socio-economic characteristics and baseline conditions should be addressed within the NPT RLDP and considered within this ISA.

A.1.3 This evidence is then used to:

- Outline the expected evolution of baseline sustainability (including environmental) conditions in the absence of the LDP Review; and,
- Define a suite of key sustainability issues which will need to be addressed within the LDP Review and which should be considered throughout this ISA (incorporating SEA) process.

A.1.4 The purpose of this baseline review is therefore to inform both emerging proposals for the LDP Review and the content of a ISA Framework that will be used to assess all substantive components of the LDP Review (i.e. all emerging policy and site options, including reasonable alternatives to those preferred by NPTC).

## **A.2 Overview of Designated Sites**

A.2.1 **Table A.1** identifies sites designated at international, national or local level for reasons of biodiversity conservation, geological importance, heritage or landscape value which are considered to have the potential to be affected by the LDP Review. The site-specific context of these designated sites needs to be considered when characterising the sustainability baseline position and identifying the relevance of existing issues and problems to the LDP Review, as detailed in Section A.3.

**Table A.1 Designated Sites of Relevance to the NPT LDP Review**

**Biodiversity Designations:**

<b>Scale</b>	<b>Designation Type</b>	<b>Within/ Outwith NPT</b>	<b>Name</b>	<b>Qualifying Features/ Interests</b>	<b>Implications for NPT LDP Review</b>	<b>Implications for ISA</b>
International / European	SPA	Within NPT	None	N/A	N/A	N/A
International / European	SPA	Outwith NPT	None	N/A	N/A	N/A
International / European	SAC	Within NPT	Kenfig/ Cynffig	Coastal sand dunes, sand beaches, machair, Tidal rivers, estuaries.	Any RLDP resulting from the LDP Review must support the management of all internationally designated sites (including possible or proposed new	Relevant ISA objectives must afford adequate protection to international designations, taking account of their site-specific

Scale	Designation Type	Within/ Outwith NPT	Name	Qualifying Features/ Interests	Implications for NPT LDP Review	Implications for ISA
					European Sites) in pursuit of their defined conservation objectives.	characteristics and qualifying features.
International / European	SAC	Within NPT	Crymllyn Bog/ Cors Crymllyn	Bogs, Marshes, Fens, Broad leaved deciduous woodland.	Any RLDP resulting from the LDP Review must support the management of all internationally designated sites (including possible or proposed new European Sites) in pursuit of their	Relevant ISA objectives must afford adequate protection to international designations, taking account of their site-specific characteristics and qualifying features.

Scale	Designation Type	Within/ Outwith NPT	Name	Qualifying Features/ Interests	Implications for NPT LDP Review	Implications for ISA
					defined conservation objectives.	
International / European	SAC	Within NPT	Coedydd Nedd a Mellte	Broad leaved deciduous woodland, heath & scrub.	Any RLDP resulting from the LDP Review must support the management of all internationally designated sites (including possible or proposed new European Sites) in pursuit of their defined	Relevant ISA objectives must afford adequate protection to international designations, taking account of their site-specific characteristics and qualifying features.

Scale	Designation Type	Within/ Outwith NPT	Name	Qualifying Features/ Interests	Implications for NPT LDP Review	Implications for ISA
					conservation objectives.	
International / European	SAC	Outwith NPT (within 15km of NPT)	Cefn Cribwr	Grasslands: Bogs, marshes, humid grassland, Heath, scrub, Broad leaves deciduous woodland.	Any RLDP resulting from the LDP Review must support the management of all internationally designated sites with the potential to be affected by development in the NPT area (including those in close proximity to the NPT boundary in	Relevant ISA objectives must afford adequate protection to international designations, taking account of their site-specific characteristics and qualifying features.

Scale	Designation Type	Within/ Outwith NPT	Name	Qualifying Features/ Interests	Implications for NPT LDP Review	Implications for ISA
					neighbouring authorities and also including possible or proposed new European Sites) in pursuit of their defined conservation objectives.	
International / European	SAC	Outwith NPT (within 15km of NPT)	Blaen Cynon	Humid grassland, Bogs, Marshes, Water fringed vegetation, heath, scrub,	Any RLDP resulting from the LDP Review must support the management of all internationally designated sites	Relevant ISA objectives must afford adequate protection to international designations, taking account of their site-

Scale	Designation Type	Within/ Outwith NPT	Name	Qualifying Features/ Interests	Implications for NPT LDP Review	Implications for ISA
				improved grassland, dry grassland, Steppes.	with the potential to be affected by development in NPT (including those in close proximity to the NPT boundary in neighbouring authorities and also including possible or proposed new European Sites) in pursuit of their defined conservation objectives.	specific characteristics and qualifying features.

Scale	Designation Type	Within/ Outwith NPT	Name	Qualifying Features/ Interests	Implications for NPT LDP Review	Implications for ISA
International / European	SAC	Outwith NPT (within 15km of NPT)	Cwm Calan	Humid grassland, bogs, marshes, water-fringed vegetation, Improved grassland, Broad leaved deciduous woodland.	Any RLDP resulting from the LDP Review must support the management of all internationally designated sites with the potential to be affected by development in NPT (including those in close proximity to the NPT boundary in neighbouring authorities and also including possible or proposed new	Relevant ISA objectives must afford adequate protection to international designations, taking account of their site-specific characteristics and qualifying features.

Scale	Designation Type	Within/ Outwith NPT	Name	Qualifying Features/ Interests	Implications for NPT LDP Review	Implications for ISA
					European Sites) in pursuit of their defined conservation objectives.	
International / European	Ramsar	Within NPT	Crymlyn Bog	Comprises a floodplain-valley mire located within a lowland coastal context and is the most extensive wetland of its type in	Any RLDP resulting from the LDP Review must support the management of all internationally designated sites with the potential to be affected by development in NPT (including those in	Relevant ISA objectives must afford adequate protection to international designations, taking account of their site-specific characteristics and qualifying features.

Scale	Designation Type	Within/ Outwith NPT	Name	Qualifying Features/ Interests	Implications for NPT LDP Review	Implications for ISA
				Wales. Also, a SAC, SSSI and NNR.	close proximity to the NPT boundary in neighbouring authorities and also including possible or proposed new European Sites) in pursuit of their defined conservation objectives.	
National	SSSI	Within NPT	Caeau Ton-Y-Fildre Cefn Gwrhyd Rhydyfro	The identified SSSIs have been designated owing to the	Any RLDP resulting from this LDP Review must support the management of all	Relevant ISA objectives must afford adequate protection to national

Scale	Designation Type	Within/ Outwith NPT	Name	Qualifying Features/ Interests	Implications for NPT LDP Review	Implications for ISA
			Cilybebyllcoed Cwm Du Cilmaengwyn Cors Crymlyn Crymlyn bog, Craig-Y-Llyn Crymlyn Burrows Cwm Gwrelych and Nant Llyn Fach Streams Cynffig/Kenfig, Dyffrynoedd Nedd a Mellte a Moel Penderyn,	presence of nationally important or rare habitat types within each.	nationally designated sites in pursuit of their defined conservation objectives.	designations, taking account of their site-specific characteristics and qualifying interests.

Scale	Designation Type	Within/ Outwith NPT	Name	Qualifying Features/ Interests	Implications for NPT LDP Review	Implications for ISA
			Earlswood Road Cutting and Ferryboat Inn quarries, Eglwys Nunydd Reservoir Fforest Goch Bog Frondeg Gorsllwyn Onllwyn Gwrhyd Meadows Hafod Wennol Grasslands Margam Moors			

Scale	Designation Type	Within/ Outwith NPT	Name	Qualifying Features/ Interests	Implications for NPT LDP Review	Implications for ISA
			Mynydd Ty-Isaf, Rhondda Pant-Y-Sais Tairgwaith			
National	NNR	Within NPT	Kenfig Pool and Dunes:Crymlyn Bog and Pant Y Sais	Kenfig Pool NNR hosts Glamorgan's largest lake whilst Crymlyn Bog and Pant Y Sais consists in part of the largest	Any RLDP resulting from this LDP Review must support the management of all nationally designated sites in pursuit of their defined conservation objectives.	Relevant ISA objectives must afford adequate protection to national designations, taking account of their site-specific characteristics and qualifying interests.

Scale	Designation Type	Within/ Outwith NPT	Name	Qualifying Features/ Interests	Implications for NPT LDP Review	Implications for ISA
				lowland fen in Wales.		
Local	SINCs	Within NPT	Catwg Wetland, Hawthorn Close, Hafodheulog Wood East Meadow, Tennant Canal, Gorsllwyn Meadows, Rolling Mill Cwmavan, Cwm Blaenpelenna , Harbourside Law Courts, Khartoum Tip, Baglan Bay, St David's Graveyard,	The identified SINCS host a wide range of locally important habitat types and either the observed presence of or potential to support a wide range of floral and	Any RLDP resulting from this LDP Review should provide an appropriate level of protection and enhancement opportunities for biodiversity sites designated at the local level.	Relevant ISA objectives must afford an appropriate level of protection for all designated sites, commensurate with their status and purpose.

Scale	Designation Type	Within/ Outwith NPT	Name	Qualifying Features/ Interests	Implications for NPT LDP Review	Implications for ISA
			Briton Ferry Waste Ground, Earlswood Area, Lower River Afan Estuary, The Quays Car Park Bunds, Jersey Marine Woods, Margam Country Park, Square Pond, Earlswood Grasslands, Tyle'r Waun, GCG Common, Pandy Farm, Swansea Canal, Neath Canal, Eglwys Nunydd, Caroline Street, Junction 38 Wetland	faunal species, including indicator species. A number of the SINCS overlap with higher level statutory designations.		

Scale	Designation Type	Within/ Outwith NPT	Name	Qualifying Features/ Interests	Implications for NPT LDP Review	Implications for ISA
			Complex, Ynysdawle, Cwm du Glen & Glanrhyd Plantation, Land behind Marigold Place, Dyffryn Woods, Tiroedd Comin Cwm Amman Uchaf, Amazon Woodlands, Baglan Brownfield Slack, Lamb & Flag, Nant Y Cafn, Heol Heddwch, Baglan Panhandle, Sarn Helen, Bwlch Road Hedges, Derwydd Avenue, White Lady's Farm			

Scale	Designation Type	Within/ Outwith NPT	Name	Qualifying Features/ Interests	Implications for NPT LDP Review	Implications for ISA
			Orchard, Ffynnon Dawel Selar, Aberbaiden Farm Meadows, Giant's Grave, Brunel Dock Grassland, Cilfrew Meadow, Mynydd y Garth, Mynydd Gellionnen, Abernant Road Playing Field, Jaffa Land Baglan, Gelli Dochlithe, Dyffryn Cellwen, Rhos Common, Intervalley Road, Banwen, Blaendulais Marshy Grassland,			

Scale	Designation Type	Within/ Outwith NPT	Name	Qualifying Features/ Interests	Implications for NPT LDP Review	Implications for ISA
			Rheola Borrow Pits Grassland, Ynys Corrwg Farm, Bryn Goytre Cycleway, Cymer Tip, Treforgan, Resolven Minewater Treatment Units, Gwynfi Street, Rheola Lowland Grassland, Riverside Industrial Estate, Hafodheulog Wood North Meadow, Ynysmeudwy Molinia Meadow, Coed Hirwaun Wetland, Rhyslyn, Neath			

Scale	Designation Type	Within/ Outwith NPT	Name	Qualifying Features/ Interests	Implications for NPT LDP Review	Implications for ISA
			Estuary, St John's Graveyard, Nant Y Wern, Upper Melincourt Valley, Banwen Pond, Rhos Bends Bog, Glan-Yr-Afon, Gnoll Country Park, Brunel Dock Reedbed, Shelone Woods, Pen Yr Alltwen School Road, Crynant, Dan-Y-Coed, Little Warren, Preswylfa Dingle, Aberbaiden Farm Small Meadow, Fields Behind Heol Y			

Scale	Designation Type	Within/ Outwith NPT	Name	Qualifying Features/ Interests	Implications for NPT LDP Review	Implications for ISA
			Coedcau, Scotch Street, Meadow Row, Bryn, Parc Croeserw, Bryn Tip, Cwmavon Coal Tips, Pentreffynnon, Pant-Y-Brwyn, Garth Mor, Fabian Way Wildflower Verge, The Waun, Cimla, Bryncoch Farm, Coed Bach A'r Cwm, Floristically Diverse Forestry Verge, Betony Field, Triangular Pond, Crymlyn Burrows,			

Scale	Designation Type	Within/ Outwith NPT	Name	Qualifying Features/ Interests	Implications for NPT LDP Review	Implications for ISA
			Caeau Ynysgeinon, Carn Llechart, Coed Darcy Gcn Area, Bryn Gwyn, Red Jacket Fen, Adjacent to Gors Llwyn, Marden Park Baglan, Llandarcy Village Green, Cwmafan Green Corridor, Gwlyptir Mynachlog Need, Resolven Alluvial Meadows, Panasonic, Land behind Pen Y Bryn, Maerdy Playing Fields, Parc			

Scale	Designation Type	Within/ Outwith NPT	Name	Qualifying Features/ Interests	Implications for NPT LDP Review	Implications for ISA
			Rhiwfawr, Abernant Colliery, Onllwyn Coal Washery, Waun Sterw, Morfa Glas, Tonmawr Minewater Treatment & Surrounding Habitats, Afan Mineral Railway, Fferm Alltwenganol, Roman Way Reedbed, Aberhenwaun Uchaf, Penrhys Fawr, Resolven Minewater Treatment area OMH.			

Scale	Designation Type	Within/ Outwith NPT	Name	Qualifying Features/ Interests	Implications for NPT LDP Review	Implications for ISA
Local	LNR	Within NPT	Pant-Y-Sais, Eaglesbush Valley, Cwm Du Glen and Glanrhyd Plantation, Bryn Tip, Swansea Canal	LNR are sites which have interesting wildlife or geology but are also important for local residents, schools and are places where people who may have no specific interest in natural	Any RLDP resulting from this LDP Review should provide an appropriate level of protection and enhancement opportunities for nature reserves designated at the local level.	Relevant ISA objectives must afford an appropriate level of protection for all designated sites, consummate with their status and purpose.

Scale	Designation Type	Within/ Outwith NPT	Name	Qualifying Features/ Interests	Implications for NPT LDP Review	Implications for ISA
				<p>history can enjoy access to nature. NPTC's countryside team aim to make the LNRs exemplars in the management of designated sites and green space, with the goals of conserving nature,</p>		

Scale	Designation Type	Within/ Outwith NPT	Name	Qualifying Features/ Interests	Implications for NPT LDP Review	Implications for ISA
				providing opportunities for study or research and allowing access and recreation.		

**Geological Designations:**

<b>Scale</b>	<b>Designation Type</b>	<b>Within/Outwith NPT</b>	<b>Name</b>	<b>Qualifying Features/Interests</b>	<b>Implications for NPT LDP Review</b>	<b>Implications for ISA</b>
National	SSSI	Within NPT	Cwmgwrelych Nant Llyn Fach Streams	Geological SSSIs are designated owing to the presence of nationally important or rare geological features.	Any RLDP resulting from this LDP Review must support the management of all nationally designated sites to maintain or improve their current condition.	Relevant ISA objectives must afford adequate protection to national designations, taking account of their site-specific characteristics and qualifying interests.
Local	RIGS	Within NPT	Aberdulais Falls Melincourt Brook		Any RLDP resulting from this LDP Review should provide an appropriate level	Relevant ISA objectives must afford an appropriate level of protection for all

Scale	Designation Type	Within/Outwith NPT	Name	Qualifying Features/Interests	Implications for NPT LDP Review	Implications for ISA
					<p>of protection for locally designated regionally important geodiversity sites.</p>	<p>designated sites, commensurate with their status and purpose. There is also a need to assess likely effects on important geological features under the 'soil' environmental topic as prescribed within Schedule 2 of the SEA Regulations.</p>

**Cultural Heritage Designations:**

Scale	Designation Type	Within/ Outwith NPT	Name	Qualifying Features/ Interests	Implications for NPT LDP Review	Implications for ISA
National	SM	Within NPT	97 Scheduled Monuments across the NPTC area	Of the 97 identified Scheduled Monuments (SM, 5 date from the Early Medieval period, 14 from the Medieval period, 27 Post Medieval/Modern, 45 Prehistoric and 6 Roman.  The majority are sited within	Any RLDP resulting from this LDP Review must support the protection and enhancement of all nationally designated historic assets, including their setting. The identified historic assets benefit from statutory protection which	Relevant ISA objectives must afford adequate protection to nationally designated historic assets, taking account of site-specific characteristics and the relevance of historic assets to the NPTC area.

Scale	Designation Type	Within/ Outwith NPT	Name	Qualifying Features/ Interests	Implications for NPT LDP Review	Implications for ISA
				<p>Margam (15). A wide range of historic structures have been designated, including hill forts, chapels, standing stones, ironworks, castles and cairns, each of which is of historical significance and forms an important landscape feature.</p>	<p>must be taken account of within policies, proposals and guidance within the RLDP.</p>	

Scale	Designation Type	Within/ Outwith NPT	Name	Qualifying Features/ Interests	Implications for NPT LDP Review	Implications for ISA
National	Listed Buildings	Within NPT	395 Listed Buildings across the NPTC area	A wide range of structures and buildings have been listed owing to their features of architectural importance.	Any RLDP resulting from this LDP Review must support the protection and enhancement of all nationally designated historic assets, including their setting. The identified historic assets benefit from statutory protection which must be taken account of within	Relevant ISA objectives must afford adequate protection to nationally designated historic assets, taking account of site-specific characteristics and the relevance of historic assets to the NPTC area.

Scale	Designation Type	Within/ Outwith NPT	Name	Qualifying Features/ Interests	Implications for NPT LDP Review	Implications for ISA
					policies, proposals and guidance within the RLDP.	
National	Conservation Areas	Within NPT	There are 6 Conservation Areas within the NPTC area: Cilybebyll, Neath Town Centre, Llandarcy Village, Tonna Canal Depot, Glynneath Woolen Mill, Margam Park	The designated Conservation Areas are centred upon clusters of Listed Buildings or other structures of architectural importance.	Any RLDP resulting from this LDP Review must support the protection and enhancement of all nationally designated historic assets, including their setting. The identified historic	Relevant ISA objectives must afford adequate protection to nationally designated historic assets, taking account of site-specific characteristics and the relevance of

Scale	Designation Type	Within/ Outwith NPT	Name	Qualifying Features/ Interests	Implications for NPT LDP Review	Implications for ISA
					assets benefit from statutory protection which must be taken account of within policies, proposals and guidance within the RLDP.	historic assets to the NPTC area.

**Landscape Designations:**

Scale	Designation Type	Within/ Outwith NPT	Name	Qualifying Features/ Interests	Implications for NPT LDP Review	Implications for ISA
National	AONB		There are no AONB designated within the NPT Area. However, the Gower AONB is approx.20 miles from the NPTC boundary, covering much of the peninsula and is renowned for its scenic quality, particularly the coastline, much of	N/A	N/A	N/A

Scale	Designation Type	Within/ Outwith NPT	Name	Qualifying Features/ Interests	Implications for NPT LDP Review	Implications for ISA
			which is Heritage Coast.			
National	National Park	Within NPT	1 National Park which falls within the boundary of the NPTC area:  Brecon Beacons National Park	National Parks are areas of exceptional natural beauty designated to conserve and enhance the natural beauty, wildlife and cultural heritage of the parks, protect the social and economic wellbeing of its communities and	Any RLDP resulting from this LDP Review should provide an appropriate level of protection and enhancement opportunities for the Brecon Beacons National Park. The duty relating to the	Relevant ISA objectives must afford adequate protection to national designations, taking account of their site-specific characteristics and qualifying interests.

Scale	Designation Type	Within/ Outwith NPT	Name	Qualifying Features/ Interests	Implications for NPT LDP Review	Implications for ISA
				promote public enjoyment and understanding of their special qualities.	purposes of the National Park also applies outside the park and in its setting.	
Local	SLA	Within NPT	The following SLAs are currently designated at the local level within the NPTC area:  Mynydd y Garth, Dulais Valley, Vale of Neath, Margam, Mynddy Gelli, & Foel Trawsant	Policy ENV2 within the existing NPT LDP identifies these 6 SLAs as being unique, exceptional or distinctive to NPT.	Any RLDP resulting from this LDP Review should provide an appropriate level of protection and enhancement opportunities for landscapes	Relevant ISA objectives must afford an appropriate level of protection for all designated sites, commensurate with their status and purpose.

<b>Scale</b>	<b>Designation Type</b>	<b>Within/ Outwith NPT</b>	<b>Name</b>	<b>Qualifying Features/ Interests</b>	<b>Implications for NPT LDP Review</b>	<b>Implications for ISA</b>
					designated at the local level.	

### **A.3 Environmental and Socio-economic Baseline Conditions**

A.3.1 Informed by **Table A.1**, **Table A.2** below outlines the current environmental and socio-economic conditions within the area likely to be affected by the LDP Review, in particular (but not exclusively) the NPTC administrative area. This review also identifies associated existing environmental and socio-economic problems and issues which the LDP Review should address and which should be considered throughout this ISA process.

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

SEA Topic	Baseline Key Characteristics	Existing Objectives, Issues and Problems	Implications for NPT LDP Review	Implications for ISA
(1) Biodiversity, Fauna and Flora	<b>Designated Sites:</b> As detailed in <b>Table A.1</b> , NPT hosts a number of designated sites at European, national and local levels for reasons of biodiversity conservation and value, whilst other designated sites out with the NPTC area could also be affected by the LDP Review. At the European level NPT hosts 3 SACs and 1 Ramsar site. At the national level the NPTC area hosts 21 SSSI's and 2 NNRs. At the local level, NPTC has designated 129 SINCS, 2 RIGS and 5 LNRs.	All identified sites are designated for specific reasons of ecological important or biodiversity conservation and have conservation objectives related to these, e.g. the protection of relevant qualifying features. <b>Table A.1</b> above identifies the qualifying features of relevant European sites (SACs and Ramsar sites). There is a need	Any proposals for development within the NPTC area could adversely impact designated sites and biodiversity through a range of direct and indirect effects, potentially including loss of roosting, foraging and other habitats, physical or noise disturbance, abstraction of river water, discharge of effluent, contamination and air pollution. As such, all proposals and policies within the emerging RLDP arising from the LDP Review must	The ISA Framework must include objectives relating to the appropriate conservation, protection and enhancement of statutorily and non-statutorily designated sites.

SEA Topic	Baseline Key Characteristics	Existing Objectives, Issues and Problems	Implications for NPT LDP Review	Implications for ISA
		to safeguard these qualifying features from adverse effects, protect the integrity of designated sites and work towards the achievement of defined conservation objectives.	take account of relevant ecological sensitivities. This includes the need to support the management of all designated sites in relation to their status and in pursuit of their defined conservation objectives. Any RLDP must also provide an appropriate level of protection for protected species and non-designated ecological interests.	
(1) Biodiversity, Fauna and Flora	<b>Priority and other notable habitats:</b> NPTC's habitats include ancient woodlands, unimproved wet grasslands,	All identified sites are designated for specific reasons of ecological important or	Any proposals for development within the NPTC area could adversely impact designated sites and	The ISA Framework should include appropriate objectives to assess potential

SEA Topic	Baseline Key Characteristics	Existing Objectives, Issues and Problems	Implications for NPT LDP Review	Implications for ISA
	<p>chalk grassland, river valleys and rocky gorges, coastal sand dunes and saltmarsh. These habitats support varied flora and fauna, including many protected, rare or declining species.</p>	<p>biodiversity conservation and have conservation objectives related to these, e.g. the protection of relevant qualifying features. <b>Table A.1</b> above identifies the qualifying features of relevant European sites (SACs and Ramsar sites). There is a need to safeguard these qualifying features from adverse effects, protect the integrity of designated sites and work towards the</p>	<p>biodiversity through a range of direct and indirect effects, potentially including loss of roosting, foraging and other habitats, physical or noise disturbance, abstraction of river water, discharge of effluent, contamination and air pollution. As such, all proposals and policies within the emerging RLDP arising from the LDP Review must take account of relevant ecological sensitivities. This includes the need to support the management of all designated sites in relation to their status and in pursuit of</p>	<p>effects on habitats and species from proposals (including cumulative development) and policies within the emerging RLDP. This should include consideration of impacts such as habitat loss, recreational impacts, water abstraction, pollution and disturbance effects.</p>

SEA Topic	Baseline Key Characteristics	Existing Objectives, Issues and Problems	Implications for NPT LDP Review	Implications for ISA
		achievement of defined conservation objectives.	their defined conservation objectives. Any RLDP must also provide an appropriate level of protection for protected species and non-designated ecological interests.	
(2) Population (including relevant socio-economic conditions)	<p><b>Governance and Statistical Geographical Units:</b> NPTC is the unitary authority responsible for local government across a 442km<sup>2</sup> area of South Wales. The authority hosts five lower level Town Councils and 14 Community Councils. The unitary authority contains two</p>	N/A	The preparation of any RLDP will need to be closely aligned with the preparation of the SDP to ensure that once adopted, both documents provide a coherent framework for effectively and efficiently addressing relevant planning issues.	The ISA Framework should include appropriate objectives to assess the ability of the emerging RLDP to meet existing and predicted future population needs, in particular with regards to the accessibility and

SEA Topic	Baseline Key Characteristics	Existing Objectives, Issues and Problems	Implications for NPT LDP Review	Implications for ISA
	<p>whole constituencies: Aberavon and Neath.</p> <p>The principal towns in NPT are Neath, Port Talbot and Pontardawe. NPT stretches from the coast to the borders of the Brecon Beacons National Park. A large proportion of NPT is characterised by uplands/semi-uplands and forestry. The upland areas are characterised by five valleys: Vale of Neath, Dulais Valley, Afan Valley, Swansea Valley and Upper Amman Valley.</p> <p>As a unitary authority, NPTC is also the single LPA for the area.</p>			<p>provision of public services.</p> <p>The ISA Framework proposed for use in the ISA of the LDP Review (<b>Section 5</b>) should be kept under review and tested for compatibility against the SA Framework for the SDP once this has been produced.</p>

SEA Topic	Baseline Key Characteristics	Existing Objectives, Issues and Problems	Implications for NPT LDP Review	Implications for ISA
	<p>The Planning (Wales) Act 2015 provides a legal framework for the preparation of SDPs at the regional level (refer to <b>Appendix B</b> for further details). An SDP is expected be prepared in due course for the South West Wales Region incorporating the NPTC area.</p> <p>NPTC is also part of the Swansea Bay City Deal, a £1.3bn investment secured by the Swansea Bay City Region for 11 major projects across Pembrokeshire, Carmarthenshire, Swansea and NPT. In NPT, this will result in the creation of the Centre for</p>			

SEA Topic	Baseline Key Characteristics	Existing Objectives, Issues and Problems	Implications for NPT LDP Review	Implications for ISA
	<p>Excellence in Next Generation Services for start-up businesses, the ASTUTE Factory of the Future for smart technologies and a new National Steel Innovation Centre for research, testing and knowledge sharing.</p>			
(2) Population (including relevant socio-economic conditions)	<p><b>Demographics:</b> NPTC has an estimated population of 141,900 (2021<sup>5</sup>), around 4.6% of the total population of Wales (3,105,400). 2018 based projections<sup>6</sup> suggest that the population will</p>	<p>Projected population ageing is likely to create issues for long term workforce replacement and increase pressures on</p>	<p>The LDP Review must take into account the characteristics of the resident and working populations of the NPTC area, particularly with regard to current and future predicted labour</p>	<p>The ISA Framework should include appropriate objectives to assess the ability of the emerging RLDP to meet existing and predicted future</p>

<sup>5</sup> NOMIS: <https://www.nomisweb.co.uk/reports/lmp/la/1946157394/report.aspx>

<sup>6</sup> StatsWales: <https://statswales.gov.wales/Catalogue/Population-and-Migration/Population/Projections/Local-Authority/2018-based/populationprojections-by-localauthority-year>

SEA Topic	Baseline Key Characteristics	Existing Objectives, Issues and Problems	Implications for NPT LDP Review	Implications for ISA
	<p>increase from 142,906 in 2018 to 143,621 by 2021, increasing to 144,238 by 2028, which equates to an increase of 1% over the ten-year period. Additionally, between 2018-2028, those aged 15 and under are expected to decline by 4.46%, while those aged 16-64 are projected to decline by 1.7%. Conversely, the proportion aged 65+ is projected to increase by 13.3% between 2018 and 2028.</p> <p>In terms of statistical units, there are 91 Lower Super Output Areas (LSOAs) within the NPTC</p>	<p>a range of public services.</p>	<p>supplies, employment needs, skill levels and socio-economic factors (as detailed below).</p> <p>It will be important for the RLDP to set out coherent strategies in respect of housing land and community infrastructure provision to meet current and expected future needs. Robust evidence to identify these needs should also therefore be collated and kept up to date throughout the LDP Review.</p>	<p>population needs, in particular with regards to the accessibility and provision of public services.</p>

SEA Topic	Baseline Key Characteristics	Existing Objectives, Issues and Problems	Implications for NPT LDP Review	Implications for ISA
	area, representing 4.8% of the 1909 total LSOAs in Wales.			
(2) Population (including relevant socio-economic conditions)	<b>Housing:</b> The 2022 AMR assesses housing delivery to date over the LDP Plan period (2011-2026). The AMR shows that the delivery of housing has fallen below the targets, specifically, since the LDP base date (2011), the number of housing completions totals 2,457 dwellings compared against the annual cumulative target of 5,603 in the monitoring framework (44% of the cumulative annual target to date has been delivered). NPT is split	The identification of a current housing land shortfall means that insufficient housing is likely to be delivered through the planning system to meet identified needs. However, a RLDP must be underpinned by up to date calculations of housing need, which may differ from the housing land requirements set under	The LDP Review will assess the housing need for NPT over the intended period of the RLDP and set a new housing land requirement accordingly. Any RLDP resulting from this LDP Review will then need to be underpinned by a clear housing land strategy and will need to allocate a sufficient quantum and appropriate range of housing sites to satisfy the identified housing land requirement.	The ISA Framework should include objectives relating to housing provision to meet identified needs, both in terms of the availability and quality of the housing stock.

SEA Topic	Baseline Key Characteristics	Existing Objectives, Issues and Problems	Implications for NPT LDP Review	Implications for ISA
	<p>into multiple housing wards. The top 5 largest number of households are in the following Wards- Margam and Tai-bach (7,790), Baglan (6,724), Sandfields West (6,679), Sandfields East (6,654), and Bryn and Cwmavon (6,571)<sup>7</sup>.</p> <p>In total there are an estimated 66,402<sup>8</sup> dwellings across NPT, of which approximately 67% are owner occupied and 33% are rented<sup>9</sup></p>	<p>different economic conditions for the existing LDP.</p> <p>Alongside the ageing population, housing demand is anticipated to increase with projected increases in the number of one-bed dwellings required.</p> <p>At present the overall level of demand for affordable housing is</p>		

<sup>7</sup> [Nomis - Official Census and Labour Market Statistics - Nomis - Official Census and Labour Market Statistics \(nomisweb.co.uk\)](https://www.nomisweb.co.uk/)

<sup>8</sup> [Nomis - Official Census and Labour Market Statistics - Nomis - Official Census and Labour Market Statistics \(nomisweb.co.uk\)](https://www.nomisweb.co.uk/)

<sup>9</sup> [Nomis - Official Census and Labour Market Statistics - Nomis - Official Census and Labour Market Statistics \(nomisweb.co.uk\)](https://www.nomisweb.co.uk/)

SEA Topic	Baseline Key Characteristics	Existing Objectives, Issues and Problems	Implications for NPT LDP Review	Implications for ISA
	<p>Average house prices within NPT increased by 12% from March 2022 (£150,516) to March 2023 (£168,305) which is £46,455 below the average property prices for Wales at £214,760 (March 2023)<sup>10</sup>.</p> <p>Over the current LDP Plan period, there is an identified need for approximately 8,000 dwellings over to the year 2026. The sub-area of Neath requires approximately 4,100 of these, in contrast to Amman Valley which</p>	<p>not being met across NPT.</p>		

<sup>10</sup> UK House Price Index - Wales (March 2023)

SEA Topic	Baseline Key Characteristics	Existing Objectives, Issues and Problems	Implications for NPT LDP Review	Implications for ISA
	<p>requires approximately 1% (or 100 homes).</p> <p>With regards to affordable housing, since the LDP base date (2011), the number of affordable housing completions delivered via s.106 totals 72 dwellings. This is significantly below the cumulative target of 833 dwellings. The delivery of affordable housing is directly linked to broader housing delivery and the position reflects the fact that LDP allocated sites are not coming through the planning system as originally anticipated. A number of allocated sites have been</p>			

SEA Topic	Baseline Key Characteristics	Existing Objectives, Issues and Problems	Implications for NPT LDP Review	Implications for ISA
	<p>delivered by RSLs, whereby only with Social Housing Grant support the sites become viable.</p>			
<p>(2) Population (including relevant socio-economic conditions)</p>	<p><b>Educational Attainment/Qualifications<sup>11</sup>:</b> In 2021 ,11% of the working age population (16 to 64yr) in the NPTC area held no qualifications, which is higher than the percentage of the population with no qualifications across Wales (8%).  This trend was also observed each year between 2011 – 2017, although the proportion of</p>	<p>The latest available statistics highlight that as a whole, the working age population within the NPTC area holds fewer and less advanced qualifications than across Wales, although current educational attainment amongst school aged</p>	<p>The LDP Review should identify adequate provision of community infrastructure to meet existing and projected future population needs, including with respect to education infrastructure capacity and choice.</p>	<p>The ISA Framework should include appropriate objectives to assess the ability of the emerging RLDP to meet existing and predicted future population needs, including with regards to the adequacy, quality and spatial distribution of education</p>

<sup>11</sup> Educational attainment statistics sourced from NOMIS: Labour Market Profile – Neath Port Talbot

SEA Topic	Baseline Key Characteristics	Existing Objectives, Issues and Problems	Implications for NPT LDP Review	Implications for ISA
	<p>the NPT population with no qualifications is shrinking (5% fall compared to 4% fall).</p> <p>The level of attainment achieved by the working age population with qualifications is lower in NPT than across Wales. 32% in NPT are qualified to level NVQ3 or above compared with 36% across Wales.</p>	<p>people is similar across both geographies.</p> <p>The observed high proportion of the working age population with no qualifications. This is of concern as the limits the ability of a sizeable demographic group to be economically active and restricts local access by employers to high skilled labour</p>		<p>infrastructure provision.</p>
(2) Population (including	<p><b>Community Infrastructure:</b> NPT is split into multiple wards: Aberavon, Aberdulais, Alltwen,</p>	<p>The NPT Wellbeing Assessment (2017) indicates that the NPTC</p>	<p>The LDP Review should identify adequate provision of community infrastructure to</p>	<p>The ISA Framework should include appropriate objectives</p>

SEA Topic	Baseline Key Characteristics	Existing Objectives, Issues and Problems	Implications for NPT LDP Review	Implications for ISA
<p>relevant socio-economic conditions)</p>	<p>Baglan, Blaengwrach and Glynneath West, Briton Ferry East, Briton Ferry West, Bryn and Cwmavon, Bryn-coc North, Bryn-coch South, Cadoxton, Cimla and Pelenna, Coedffranc Central, Coedffranc North, Coedffranc West, Crynant Onllwyn and Seven Sisters, Cwmllynfell and Ystalyfera, Cymer and Glyncorrwg, Dyffryn, Glynneath Central and East, Godre'r Graig, Gwaun-Cae-Gurwen and Lower Brynamman, Gwynfi and Croeserw, Margam and Taibach, Neath East, Neath North, Neath South, Pontardawe, Port Talbot,</p>	<p>area is presently served by a range of good quality community infrastructure and open spaces. However, funding shortfalls for cultural facilities may affect their availability. It will be important that these are protected and where possible enhanced and that the infrastructure is capable of meeting the changing needs of the population. In addition, further community infrastructure and open</p>	<p>meet existing and projected future population needs, including with respect to outdoor sport provision, children's playing space, community halls, accessible natural open space and allotment provision.</p>	<p>to assess the ability of the emerging RLDP to meet existing and predicted future population needs, including with regards to the provision and quality of community infrastructure.</p>

SEA Topic	Baseline Key Characteristics	Existing Objectives, Issues and Problems	Implications for NPT LDP Review	Implications for ISA
	<p>Resolven and Tonna, Rhos, Sandfields East, Sandfields West, and Trebanos.</p> <p><u>Educational facilities</u></p> <p>NPTC act as the education authority in the area and operate the primary and secondary schools within the County. It operates 6 Welsh Language Schools, 1 infant school, 1 junior school, 3 middle schools, 51 primary schools, 5 secondary schools, and 3 special schools. Further education institutions include St Joseph’s Catholic School &amp; Sixth Form Centre and Ysgol</p>	<p>space provision will be required to support projected population growth within NPT.</p>		

SEA Topic	Baseline Key Characteristics	Existing Objectives, Issues and Problems	Implications for NPT LDP Review	Implications for ISA
	<p>Gyfun Ystalyfera who provide sixth form opportunities. NPT College operates across the County Borough, with main activities focused in two campuses in both Port Talbot and Neath.</p> <p>Higher education institutions in the area include Swansea University, which has a science and innovation campus in Crymlyn Burrows and the University of South Wales which has a campus located at Baglan Energy Park in Port Talbot. University of South Wales also</p>			

SEA Topic	Baseline Key Characteristics	Existing Objectives, Issues and Problems	Implications for NPT LDP Review	Implications for ISA
	<p>has a presence also on the Baglan Energy Park.</p> <p><u>Community facilities</u></p> <p>There are 8 libraries managed by NPT Libraries and 7 community managed libraries in the NPTC area.</p> <p>Four areas of NPT were awarded Green Flag status in 2023<sup>12</sup>: Gnoll Estate Country Park, Margam Country Park, Talbot Memorial Park and Neath’s Victoria Gardens.</p> <p>Margam Country Park is one of only seven sites in Wales to be</p>			

<sup>12</sup> [Green Flags Fly High Across NPT Parks - NPT News](#)

SEA Topic	Baseline Key Characteristics	Existing Objectives, Issues and Problems	Implications for NPT LDP Review	Implications for ISA
	<p>accredited as a Green Heritage Site.</p> <p>The Green Flag Community Award was also given to the Amman Valley Trotting Club, Cilybebyll Community Growers, Cwmafan Community Orchards, Glantawe Riverside Park (Pontardawe), The Friends of Neath Iron Abbey Company, Vivian Park Nature Reserve, and The Lane Community Garden.</p>			
(2) Population	<b>Employment<sup>13</sup>:</b>	In recent years NPT has consistently	The LDP Review should develop and appropriate	The ISA should assess whether the

<sup>13</sup> All data sourced from NOMIS: Labour Market Profile – Neath Port Talbot

SEA Topic	Baseline Key Characteristics	Existing Objectives, Issues and Problems	Implications for NPT LDP Review	Implications for ISA
<p>(including relevant socio-economic conditions)</p>	<p>In 2022, the employment rate within the NPT was 70%, which is slightly lower than across Wales (73%).</p> <p>In NPT, the percentage of the working age population that is economically active is also lower in NPT (73%) than across Wales (76%).</p> <p>The official unemployment rate in the NPT stood at 4.3% for 2019, which was higher than the unemployment rate across Wales (3.0%).</p> <p>Related to this, the most recent data shows that in 2021 NPT had a jobs density of 0.64 (ratio</p>	<p>experienced a higher unemployment rate than the national averages for Wales and Great Britain. This indicates either that insufficient or unsuitable employment opportunities are provided for residents of NPT, taking account of education and skills levels (which, as detailed below, are also below national averages).</p>	<p>employment land and economic development strategy for the RLDP. It will be important for emerging policies, proposals and guidance to support the creation of a broad range of new employment opportunities which match the skill levels of the existing labour market, whilst also seeking to attract high value sectors such as energy, advanced manufacturing, logistics and ports.</p>	<p>RLDP will be effective in providing increased employment opportunities in appropriate locations and appropriate sectoral diversification into high value industries. The ISA Framework should therefore include objectives relating to high quality employment, economic growth, sectoral diversification and inward investment.</p>

SEA Topic	Baseline Key Characteristics	Existing Objectives, Issues and Problems	Implications for NPT LDP Review	Implications for ISA
	<p>of jobs to resident working age population) compared with 0.77 across Wales.</p> <p>NPT accommodates a number of manufacturing facilities such as steel, petrochemicals, automotive engineering and apparel; most notably Port Talbot Steelworks, capable of producing almost 5 million tonnes of steel slab per annum and a key employer in NPT.</p> <p>The largest employment sectors in NPT are for manufacturing (18%) and human health and social work activities (16%). Wholesale and retail trade;</p>			

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	<p>repair of motor vehicles and motorcycles (12%) and Public administration and defence; compulsory social security (12%). This is comparable to that of Wales overall where human health and social work activities are undertaken by 16% of the population and wholesale and retail trade; repair of motor vehicles and motorcycles at 14%.</p> <p>The range of occupations within NPTC demonstrates that those employed as managers and directors, professional, associate professional and technical occupations falls</p>			

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	<p>below the Welsh average whilst the process plant and machine operatives proportion is higher than the Wales average.</p> <p>ONS Annual Population Survey data indicates that over the period since 2015 there has been a small shift in the industry of employment of residents of NPT, as the proportion of those who work in retail and education has decreased while the proportion who worked in health, hotels, transport and communications increased.</p> <p>In 2022, full-time workers gross weekly pay in NPT averaged at</p>			

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	<p>£611.00, which was £7.50 above the Wales level. Females in NPT received £61.70 less in their gross weekly pay than the total average</p>			
<p>(2) Population (including relevant socio-economic conditions)</p>	<p><b>Inequality, Social Exclusion and Deprivation:</b> The Welsh Index of Multiple Deprivation (2019) identifies deprivation pockets throughout Wales. In 2019, of the 91 LSOAs in the NPTC are, 14 were in the most deprived 10% of Wales; 30 were in the most deprived 20%; 41 were in the most deprived 30%</p>	<p>Some parts of NPT, especially in the Valley communities, are among the most deprived areas of Wales, with low levels of economic activity and access to facilities and services, particularly for children, young people and elderly populations.</p>	<p>A holistic strategy is needed to address multiple deprivation within parts of NPT, including but not limited to the creation of new, high quality employment opportunities. Any RLDP resulting from this LDP should set out a clear employment land strategy to support the provision of new employment opportunities in</p>	<p>The ISA Framework should include appropriate objectives relating to equality, social inclusion, access to public services, employment opportunities, access to healthcare, access to open spaces and exposure to pollution (air, water, soil, etc).</p>

SEA Topic	Baseline Key Characteristics	Existing Objectives, Issues and Problems	Implications for NPT LDP Review	Implications for ISA
	<p>and 63 were in the most deprived 50% LSOAs<sup>14</sup>.</p> <p>The percentage of households that are workless in NPT is at 20% which is above the national average for Wales, 17%. The rate of workless has fallen considerably from 29% in 2011. This 31% fall compares to a 24% fall over the same period for Wales.</p> <p>The percentage of the working age population who are claiming universal credit in NPT is 3.1%, which is below the average for Wales (3.3%). The percentage</p>		<p>appropriate and accessible locations. The RLDP should also include a regeneration strategy and associated policies and proposals to catalyse a range of physical, environmental, health and socio-economic improvements within identified deprived communities.</p>	

<sup>14</sup> StatWales NPT Local Authority Analysis (2019)

SEA Topic	Baseline Key Characteristics	Existing Objectives, Issues and Problems	Implications for NPT LDP Review	Implications for ISA
	<p>of working age population has fallen from 3.7% for both NPT and Wales since 2011.</p> <p>The level of worklessness is reflected through gross disposable household income (GDHI) per head, which is lower (£14,971) than the Wales average (£15,754). In 2014, GDHI in NPTC was £14,746.00.</p>			
(3) Human Health	<p><b>Life expectancy<sup>15</sup>:</b></p> <p>Based on the latest figures for the NPT (2017-2019), life expectancy for males at birth is 77.1 and for females, 81.3.</p>	<p>It is clear to see that there are large gaps in life expectancy and healthy life expectancy between males and</p>	<p>Any RLDP resulting from this LDP Review should take into consideration the lower life expectancy and notable health inequalities of NPT</p>	<p>The ISA Framework should include objectives relating to amenity, quality of life, health outcomes,</p>

<sup>15</sup> ONS, Life expectancy of females/males 2017-2019 figures

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	<p>Across Wales, life expectancy for males at birth is 78.5, while for females it is 82.3.</p>	<p>females in the NPTC area compared to the Welsh average.</p> <p>Measures need to be put in place to firstly tackle deprivation which should then have a positive impact on life expectancy of both males and females.</p>	<p>resident population compared with regional and national averages. It should set out proposals, policies and guidance to safeguard and improve amenity. quality of life and health outcomes (physical and mental) for all within NPT, i.e. for both the workforce and residents.</p>	<p>physical health, mental health, wellbeing, safety and security. These issues should be considered holistically when assessing the proposed components of the emerging RLDP.</p>
(3) Human Health	<p><b>Physical Health/Lifestyle Choices:</b> According to the most recent National Survey for Wales, approx. 31% of adults in NPT undertook less than 30 minutes of physical activity in the previous week, 14% were</p>	<p>Physical health and lifestyle choices within NPT are in line with the averages for Wales.</p> <p>Increased education and awareness would be beneficial to the</p>	<p>Any RLDP resulting from this LDP Review should take into consideration the lower life expectancy and notable health inequalities of NPT resident population compared with regional and</p>	<p>The ISA Framework should include objectives relating to amenity, quality of life, health outcomes, physical health, mental health,</p>

SEA Topic	Baseline Key Characteristics	Existing Objectives, Issues and Problems	Implications for NPT LDP Review	Implications for ISA
	<p>active 30-149 minutes per week, and 56% active at least 150 minutes in previous week. This is in line with the average for Wales. The percentage of adults who reported to have eaten five or more portions of fruit and vegetables the previous day in NPT was 29% which is above the average for Wales (22%).</p> <p>Childhood obesity is a significant issue in NPT with the most recent data for 2020-21 identifying 20.3% of children aged 4 to 5 as being obese within NPT <sup>16</sup>.</p>	<p>population of the County Borough.</p>	<p>national averages. It should set out proposals, policies and guidance to safeguard and improve amenity, quality of life and health outcomes (physical and mental) for all within NPT, i.e. for both the workforce and residents.</p>	<p>wellbeing, safety and security. These issues should be considered holistically when assessing the proposed components of the emerging RLDP.</p>

[phw.nhs.wales/services-and-teams/child-measurement-programme/cmp-2020-21/child-measurement-programme-report-2020-2021/](https://phw.nhs.wales/services-and-teams/child-measurement-programme/cmp-2020-21/child-measurement-programme-report-2020-2021/)

SEA Topic	Baseline Key Characteristics	Existing Objectives, Issues and Problems	Implications for NPT LDP Review	Implications for ISA
	<p>Now Patient survey 2023 identifies 63.8% of adults in NPT as being overweight or obese which is the seventh highest local authority in Wales<sup>17</sup>.</p> <p>In the National Survey for Wales 2023, 12.8% of adults in NPT identify as a smoker. This is below the average for Wales, 16.9%.</p>			
(3 ) Human Health	<p><b>Mental Health and Wellbeing:</b> NPT’s health board (Abertawe Bro Morgannwg University Health Board) recorded 136.1</p>	<p>In line with the NPT Public Services Board The NPT We Want (Wellbeing Plan 2018 –</p>	<p>Any RLDP resulting from this LDP Review should take into consideration the lower life expectancy and notable</p>	<p>The ISA Framework should include objectives relating to amenity, quality of life,</p>

<sup>17</sup> Obesity levels in these Welsh areas are amongst the highest in the country | West Wales Chronicle : News for Llanelli, Carmarthenshire, Pembrokeshire, Ceredigion, Swansea and Beyond

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	<p>deaths per 100,000 residents in 2016 which were due to mental health and behavioural issues.</p> <p>Projected numbers of residents in NPT who have at least one mental disorder is expected to decrease from 26,864 (2015) to 25,758 (2035).<sup>18</sup></p>	<p>2023) there is a need to improve all aspects of the health and wellbeing of the resident population of the NPTC area, including physical health, mental health and social wellbeing.</p>	<p>health inequalities of NPT resident population compared with regional and national averages. It should set out proposals, policies and guidance to safeguard and improve amenity. quality of life and health outcomes (physical and mental) for all within NPT, i.e. for both the workforce and residents.</p>	<p>health outcomes, physical health, mental health, wellbeing, safety and security. These issues should be considered holistically when assessing the proposed components of the emerging RLDP.</p>
(3) Human Health	<p><b>Health Infrastructure:</b></p> <p>Healthcare facilities in NPT are managed by the Abertawe Bro Morgannwg University Health Board. The Health Board has</p>	<p>Adequate health infrastructure needs to be located in accessible locations to meet the needs of</p>	<p>The LDP Review should identify adequate provision of community infrastructure to meet existing and projected future population needs,</p>	<p>The ISA Framework should include appropriate objectives to assess the ability of the emerging RLDP to</p>

<sup>18</sup> Western Bay Population Assessment <http://www.westernbaypopulationassessment.org/en/mental-health/>

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	<p>three acute hospitals: Singleton and Morriston Hospitals in Swansea, and NPT Hospital in Port Talbot. There are also a number of smaller community hospitals primary care resource centres. There are over 300 General Practitioners, around 275 dentists, 125 Community Pharmacies, and 60 Optometry premises across the Health Board. The Board also provides General Medical Services within His Majesty's Prison Swansea<sup>19</sup>.</p>	<p>existing and future populations. A range of high quality physical and mental health facilities are required to address the changing health needs of the population, in particular given projected population ageing.</p>	<p>including with respect to healthcare facilities and services.</p>	<p>meet existing and predicted future population needs, including with regards to the adequacy, quality and spatial distribution of healthcare facilities and services.</p>

<sup>19</sup> [Swansea Bay \(optometrywales.org.uk\)](http://swansea.bay.optometrywales.org.uk)

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(4) Soil	<p><b>Geological and Ground Conditions:</b></p> <p>NPT has varied geological and soil characteristics. Historically, NPT has been an area of heavy industry, particularly metal, chemical and oil-based industries.</p> <p>NPTC last published their Contaminated Land Strategy in 2015, setting out how they will remediate contaminated land across the County Borough<sup>20</sup>.</p>	<p>New development must be appropriately sited and designed to reflect the geological and soil characteristics of NPT.</p>	<p>Any RLDP resulting from this LDP should set out appropriate proposals and policies to safeguard important geological characteristics and soil resources within NPT, as well as a framework for remediating contaminated land.</p>	<p>The ISA Framework should include objectives relating to contaminated land remediation, soil quality and pollution to ground receptors. Consequential human health and ecological risks and impacts should also be considered in a holistic manner.</p>

<sup>20</sup> NPTC Contaminated Land Strategy (2015): <https://democracy.NPTCBC.gov.uk/documents/s14150/Contaminated%20Land%20Strategy%202015%20-%20Review%20and%20Updated%20from%20Consultation.pdf>

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	<p>A total of 34 sites have been investigated, with two of these confirmed as being contaminated: Pinetree Car Sales and the Former Briton Ferry Gas Works.</p>			
(5) Water	<p><b>Waterbodies:</b> The NPTC area has one groundwater body classified poor under the Water Framework Directive (WFD); Pelenna.</p> <p>A number of waterbodies within NPT are at risk of having poor water quality owing to ‘point source pollution’. Water quality issues within the County Borough have been attributed to</p>	<p>Waterbodies across NPT vary in quality, ecological value and present condition.</p> <p>Management of water quality is essential for improving the long-term health of populations and the environment.</p>	<p>Any RLDP resulting from this LDP Review should set out policies, proposals and guidance to protect and enhance the water environment and water resources, including surface and groundwater quantity and quality. This should include measures to eliminate contamination</p>	<p>The ISA Framework should include objectives relating to the quality of the water environment and water resources, as well as to manage flood risks.</p>

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	<p>abandoned mine workings and the associated discharges of acidified iron rich water. This is identified as an issue across Wales and in parts of NPT<sup>21</sup></p>		<p>sources which harm the water environment and to regulate pollution discharges from new developments into receiving watercourses.</p>	
(5) Water	<p><b>Flood risks:</b> The four main watercourses in NPT are the Afan, Dulais, Neath and Tawe which all flow NE-SW towards Swansea Bay.</p> <p>There are three canals running through the County Borough:</p>	<p>Flood risk is an ongoing issue within NPTC due to the setting of the local authority. Housing developments should be restricted where possible from</p>	<p>Any RLDP resulting from this LDP Review should seek to manage flood risks in a sustainable manner, including by directing development away from known flood risk areas.</p>	<p>The ISA Framework should include objectives relating to the quality of the water environment and water resources, as well as to manage flood risks.</p>

21 NPTC Contaminated Land Strategy (2015): <https://democracy.NPTCBC.gov.uk/documents/s14150/Contaminated%20Land%20Strategy%202015%20-%20Review%20and%20Updated%20from%20Consultation.pdf>

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	<p>Neath Canal, Swansea Canal and Tennant Canal.</p> <p>Significant areas along all the main rivers, watercourses and coast of the County Borough are identified as being at risk of flooding.</p>	<p>development on flood plains.</p>		
(6) Air	<p><b>Air Quality Management Areas (AQMAs) and Poor Air Quality:</b> There is one identified AQMA (Taibach/Margam) within NPT, covering the majority of land and properties between Tata Steel Works and the M4 Motorway.</p>	<p>Continued monitoring of air quality within NPT is required with particular attention along the M4 corridor as development and industry grows within the County Borough.</p>	<p>Any RLDP resulting from this LDP Review should set out policies, proposals and guidance to tackle known areas of poor air quality and the likely impacts of new development on air quality, including from traffic.</p> <p>Any RLDP should seek to reduce local air pollution</p>	<p>The ISA Framework should include objectives relating to local air quality and associated health impacts. The ISA should also recognise that changes to air quality can have an impact on ecosystem</p>

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			through setting out policies and proposals to promote sustainable and active travel modes.	services which affect biodiversity and other environmental assets.
(7) Climatic Factors	<p><b>Greenhouse Gas Emissions:</b> 2020 statistics from InfoBase Cymru<sup>[1]</sup>22 show that total greenhouse gas (GHG) emissions from within NPT (46.1) show CO2 levels per resident (tonnes) significantly above the Welsh average (6.6). When measuring kilotonnes of industry and commercial CO2, NPT is significantly higher than all other authorities in Wales,</p>	Continued monitoring of GHG emissions within NPT is required to meet climate change targets, while also avoiding or mitigating GHG emissions as a result of development in the County Borough where possible.	Any RLDP resulting from this LDP Review should set out policies, proposals and guidance to support the transition to a low carbon economy. This should include the provision of a supportive policy framework for renewable and low carbon energy generation in appropriate locations. The RLDP should also include	The ISA Framework should include objectives relating to energy use, resource efficiency, sustainable transport, GHG emissions and climate change mitigation.

22 <sup>[1]</sup> InfoBase Cymru <http://www.infobasecymru.net/IAS/themes/environmentandsustainability/environment/tabular?viewId=518&geold=1&subsetId=>

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	<p>emitting 6228.3 kilotonnes. This accounts for 58% of the total industry and commercial Co2 emissions for Wales.</p> <p>In 2021, the WG published the Energy Generation in Wales (2018) Report<sup>23</sup><sup>[2]</sup>, identifying NPT as the area which generates the most renewable electricity of all local authority areas in Wales. It however also identifies NPT as the second highest consumer of electricity in Wales, therefore only</p>		<p>policies to encourage low carbon design and should set out a sustainable transport strategy which capitalises on existing rail and port infrastructure within the NPTC area to contribute to the decarbonisation of the transport sector.</p>	

23 <sup>[2]</sup> Energy Generation in Wales in 2021 [energy-generation-in-wales-2021.pdf \(gov.wales\)](https://gov.wales/sites/default/files/publications/2019-10/energy-generation-in-wales-2018.pdf) <https://gov.wales/sites/default/files/publications/2019-10/energy-generation-in-wales-2018.pdf>

SEA Topic	Baseline Key Characteristics	Existing Objectives, Issues and Problems	Implications for NPT LDP Review	Implications for ISA
	<p>generating the equivalent of 75% of the electricity consumed. NPT is identified as the authority with the greatest share of electricity capacity, 330MW, followed by Carmarthenshire (264MW), and Powys (255MW). Onshore wind makes up the majority of the capacity, with 70%, 55%, and 83% respectively.</p>			
(7) Climatic Factors	<p><b>Climate Change Impacts:</b> Climate change research predicts an increase in the severity and frequency of rainfall events. Flooding from rivers, sewers and surface water is</p>	<p>Predicted impacts from climate change up to 2050 will place significant strain on infrastructure and available resources</p>	<p>Any RLDP resulting from this LDP Review should set out policies, proposals and guidance which responds to predicted climate change impacts and allows</p>	<p>The ISA Framework should include objectives relating to climate change adaptation and the resilience of</p>

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	<p>therefore likely to increase throughout NPTC in the future. NPTC is also expected to become increasingly vulnerable to tidal flooding as sea levels rise. Coastal erosion will increase and affect coastal infrastructure. Extreme weather events will occur more frequently with greater intensity. This will impact on human health directly and upon biodiversity and food production systems.</p>	<p>across the UK, including within NPT. In particular, the effects associated with flood risk.</p>	<p>communities and businesses in the NPT to adapt to the changing climate.</p>	<p>environmental assets within NPT.</p>
(8) Material Assets	<p><b>Land Use: Neath, Port Talbot and Pontardawe</b> act as key hubs for services, employment,</p>	<p>There is an ongoing need to regenerate communities within NPT</p>	<p>Any RLDP resulting from this LDP Review should help support and promote</p>	<p>The ISA Framework should include objectives relating to</p>

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	<p>housing and retail developments for the surrounding communities. These towns are positioned at the top of the retail and commercial hierarchy of the County Borough. Briton Ferry, Skewen, Taibach and Glynneath play a strategic role within the County Borough as focus points for services, transport and community activity.</p> <p>NPT has a number of historical, archaeological and architectural assets particularly Margam Country Park, playing an important role as a leisure and tourism destination.</p>	<p>which have experienced post-industrial decline and have high levels of multiple deprivation. There is also a need to provide suitable land uses to meet identified needs, including increased housing and employment provision, whilst protecting sensitive land uses such as agriculture.</p>	<p>the efficient and appropriate use of material assets. It should set out a spatial strategy, proposals and guidance to optimise the use of land, natural resources and infrastructure. In particular, the RLDP should set out a spatial strategy, proposals and policies which optimise the use of and safeguard existing infrastructure within NPT.</p> <p>Any requirements for upgraded or new infrastructure to address existing capacity</p>	<p>resource efficiency, land use, waste management, energy, natural resources, climate change mitigation, connectivity and accessibility.</p>

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	<p>The existing LDP spatial strategy has sought to preserve material assets associated with land use broadly by focusing development along the coastal corridor and in the urban areas of NPT while providing a flexible approach to development in the Valleys.</p>		<p>constraints, decarbonise key economic sectors or to support population, employment and economic growth should be planned for through the LDP Review and must take account of relevant environmental issues. This means that the RLDP should include a policy framework to support the deployment of renewable energy technologies and heat networks in appropriate locations.</p>	

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<p>(8) Material Assets</p>	<p><b>Transport infrastructure:</b> <u>Road Network</u></p> <p>The Core Roads Network connects NPT to adjacent regions. The following roads constitute the Core Roads Network in NPT: M4, and A465.</p> <p>The Strategic Roads Network in NPT connects the major settlements and population centres in the County Borough and comprises mainly the A-roads (including the Core Roads Network).</p> <p>The local highway network connects local areas of</p>	<p>At present, parts of the highway network experience congestion especially at peak times.</p> <p>The Swansea Bay Metro is at the early stages of development, it is aimed at better connecting communities across the Swansea Bay City Region by public transport, while also developing improved rail and bus links with other parts of the UK.</p>	<p>Any RLDP resulting from this LDP Review should help support and promote the efficient and appropriate use of material assets. It should set out a spatial strategy, proposals and guidance to optimise the use of land, natural resources and infrastructure. In particular, the RLDP should set out a spatial strategy, proposals and policies which optimise the use of and safeguard existing infrastructure within NPT. Any requirements for upgraded or new</p>	<p>The ISA Framework should include objectives relating to resource efficiency, land use, waste management, energy, natural resources, climate change mitigation, connectivity and accessibility.</p>

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	<p>population to the major settlements and comprises mainly the B road networks and all classified unnumbered routes within NPT.</p> <p><u>Public Transport</u></p> <p>Neath Station and Port Talbot Parkway are mainline stations served by both the Great Western rail services from London (Paddington) to Swansea (with connections to West Wales) and Transport for Wales regional services.</p> <p>Additional passenger rail services are provided from Baglan Railway Station, Briton</p>		<p>infrastructure to address existing capacity constraints, decarbonise key economic sectors or to support population, employment and economic growth should be planned for through the LDP Review and must take account of relevant environmental issues. This means that the RLDP should include a policy framework to support the deployment of renewable energy technologies and heat networks in appropriate locations.</p>	

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	<p>Ferry Railway Station and Skewen Railway Station.</p> <p>There are also a number of freight only lines - (1) Vale of Neath – to Cwmgwrach; (2) Dulais Valley – to Onllwyn; and (3) Amman Valley – Ammanford to Tairgwaith.</p> <p>Both Neath and Port Talbot bus stations provide comprehensive local, short and medium distance bus services, including direct services to Cardiff and Swansea.</p> <p><u>Aviation and Maritime</u></p> <p>Cardiff International Airport is located within a 40-minute</p>			

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	<p>journey of Port Talbot and allows access to both National and International destinations for passengers and freight.</p> <p>Port Talbot Harbour is one of the only harbours in the UK capable of handling cape-size vessels of up to 170,000dwt.</p> <p><u>Active Travel</u></p> <p>There are various active travel routes within the NPTC area<sup>24</sup> .</p> <p>The Council’s Active Travel Map was approved by WG in December 2022. There are approximately 55 pedestrian routes totalling 47.140km in</p>			

[Active Travel \(npt.gov.uk\)](http://npt.gov.uk)

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	<p>length and 25 existing cycling routes totalling 36.400km in length.</p> <p>Part of NPTC’s active travel routes include the All Wales Coastal Path that provides a continuous walking route around the whole of Wales, totalling 870 miles.</p>			
(8) Material Assets	<p><b>Utilities infrastructure:</b></p> <p><u>Biomass</u></p> <p>The Margam Green Energy Plant installed in NPT entered commercial operation in 2019, generating renewable electricity via the grid for homes and</p>	<p>There is a need for continued decarbonisation of the energy generation sector across Wales to support the transition to a low carbon economy and to help mitigate</p>	<p>Any RLDP resulting from this LDP Review should help support and promote the efficient and appropriate use of material assets. It should set out a spatial strategy, proposals and guidance to optimise the</p>	<p>The ISA Framework should include objectives relating to resource efficiency, land use, waste management, energy, natural resources, climate change</p>

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	<p>businesses. At a cost of £160m it converts energy generated from burning waste wood before converting and exporting to the grid.</p> <p><u>Solar Energy</u></p> <p>In 2021/22 there were two permissions for solar arrays – P2022/0643 and P2022/0934. NPTC also received a screening opinion for P2022/1050, DNS consultation request for P2023/0003, and DNS Scoping Opinion RFI P2023/0181.</p> <p><u>Wind Farms</u></p> <p>NPT has the highest onshore wind capacity of all local</p>	<p>climate change. At the same time, a mix of energy generation sources is required to ensure continued security of supply and to overcome intermittency issues associated with wind and solar technologies.</p>	<p>use of land, natural resources and infrastructure. In particular, the RLDP should set out a spatial strategy, proposals and policies which optimise the use of and safeguard existing infrastructure within NPT. Any requirements for upgraded or new infrastructure to address existing capacity constraints, decarbonise key economic sectors or to support population, employment and economic growth should be planned for through the LDP Review</p>	<p>mitigation, connectivity and accessibility.</p>

SEA Topic	Baseline Key Characteristics	Existing Objectives, Issues and Problems	Implications for NPT LDP Review	Implications for ISA
	<p>authorities in Wales, generating 330MW. Several windfarms are operational in the NPT area, including the Pen y Cymoedd windfarm which opened in 2017 and is the largest in Wales and comprises of 76 turbines with a capacity of 228 MW<sup>25</sup>.</p>		<p>and must take account of relevant environmental issues. This means that the RLDP should include a policy framework to support the deployment of renewable energy technologies and heat networks in appropriate locations.</p>	
(8) Material Assets	<p><b>Waste management:</b> In NPT from 2018-2019, of the total 69,990 tonnes of municipal waste generated, 42,560 tonnes were re-used, recycled or composted, 17,881 tonnes were</p>	<p>There is a need to continue to meet statutory targets for sustainable waste disposal in NPT.</p>	<p>Any RLDP resulting from this LDP Review should help support and promote the efficient and appropriate use of material assets. It should set out a spatial</p>	<p>The ISA Framework should include objectives relating to resource efficiency, land use, waste management, energy,</p>

<sup>25</sup> [energy-generation-in-wales-2021.pdf \(gov.wales\)](https://gov.wales/energy-generation-in-wales-2021.pdf)

SEA Topic	Baseline Key Characteristics	Existing Objectives, Issues and Problems	Implications for NPT LDP Review	Implications for ISA
	<p>incinerated, and 3,312 tonnes sent for other recovery. This left only 5,883 tonnes sent to landfill. Overall, 60.8% of waste was reused/recycled or composted.</p> <p>NPTC has a partnership agreement with nearby local authorities to process waste at the Materials Recovery and Energy Centre (MREC) located at Crymlyn Burrows within NPT.</p> <p>In 2020/21, NPT exceeded the municipal waste reuse/ recycling/ composting rate which it had not exceeded in the</p>		<p>strategy, proposals and guidance to optimise the use of land, natural resources and infrastructure. In particular, the RLDP should set out a spatial strategy, proposals and policies which optimise the use of and safeguard existing infrastructure within NPT. Any requirements for upgraded or new infrastructure to address existing capacity constraints, decarbonise key economic sectors or to support population, employment and economic</p>	<p>natural resources, climate change mitigation, connectivity and accessibility.</p>

SEA Topic	Baseline Key Characteristics	Existing Objectives, Issues and Problems	Implications for NPT LDP Review	Implications for ISA
	previous monitoring period (2019/20)26.		growth should be planned for through the LDP Review and must take account of relevant environmental issues. This means that the RLDP should include a policy framework to support the deployment of renewable energy technologies and heat networks in appropriate locations.	
(8) Material Assets	<b>Natural resources:</b> NPT contains significant amounts of mineral resources; both coal and aggregate. The existing	There is a need to protect and restore landscapes with the	Any RLDP resulting from this LDP Review should help support and promote the efficient and appropriate	The ISA Framework should include objectives relating to resource efficiency,

26 [Local Authority Municipal Waste Management, 2020-21 \(gov.wales\)](https://gov.wales)

SEA Topic	Baseline Key Characteristics	Existing Objectives, Issues and Problems	Implications for NPT LDP Review	Implications for ISA
	<p>LDP described the ‘<i>whole</i>’ of the County Borough as underlain by coal resources. The coal is at its highest quality with anthracite in the north, with pockets of steam coals in the south east. Coal has been mined extensively in NPT for hundreds of years and is recognised for its positive economic contribution to the creation and sustenance of several valley communities. PPW 11<sup>th</sup> Edition states that proposals for new coal extraction will not be supported. Any such proposals must clearly demonstrate why they are needed in the context of climate</p>	<p>potential to be affected by minerals extraction.</p>	<p>use of material assets. It should set out a spatial strategy, proposals and guidance to optimise the use of land, natural resources and infrastructure. In particular, the RLDP should set out a spatial strategy, proposals and policies which optimise the use of and safeguard existing infrastructure within NPT. Any requirements for upgraded or new infrastructure to address existing capacity constraints, decarbonise key economic sectors or to</p>	<p>land use, waste management, energy, natural resources, climate change mitigation, connectivity and accessibility.</p>

SEA Topic	Baseline Key Characteristics	Existing Objectives, Issues and Problems	Implications for NPT LDP Review	Implications for ISA
	<p>change emissions reductions targets and for reasons of national energy security.</p> <p>There are two major hard rock quarries in NPT at Gilfach (Neath) and Cwm Nant Lleici (Pontardawe) which supply aggregates to both the regional and UK markets.</p>		<p>support population, employment and economic growth should be planned for through the LDP Review and must take account of relevant environmental issues. This means that the RLDP should include a policy framework to support the deployment of renewable energy technologies and heat networks in appropriate locations.</p>	
(9) Cultural Heritage	<p><b>Historic assets:</b> As detailed in <b>Table A.1</b> above, there are 97 identified Scheduled</p>	<p>NPT hosts a range of designated historic assets, each of which</p>	<p>Any RLDP resulting from this LDP Review should set out policies and proposals to</p>	<p>The ISA Framework should include objectives relating to</p>

SEA Topic	Baseline Key Characteristics	Existing Objectives, Issues and Problems	Implications for NPT LDP Review	Implications for ISA
	<p>Monuments within NPT. Of these, 5 date from the Early Medieval period, 14 from the Medieval period, 27 Post Medieval/Modern, 45 Prehistoric and 6 Roman. The majority are sited within Margam (15). There are also 395 listed buildings across the NPTC area, ranging from bridges to castles (e.g. Neath Castle). There are currently 260 Buildings of Local Importance' (BLIs) and Designated Canal Structures in NPT.</p>	<p>need to be appropriately protected from effects on their integrity and setting.</p>	<p>protect, conserve and enhance historic assets across NPT, including in terms of impacts on the setting of such assets and upon unknown archaeological resources.</p>	<p>the preservation, conservation, protection and enhancement of the historic environment.</p>
(9) Cultural Heritage	<p><b>Welsh language:</b> NPTC launched a revised Welsh</p>	<p>There is a need to safeguard and support</p>	<p>Any RLDP resulting from this LDP Review should</p>	<p>The ISA Framework should include</p>

SEA Topic	Baseline Key Characteristics	Existing Objectives, Issues and Problems	Implications for NPT LDP Review	Implications for ISA
	<p>Language Promotion Strategy in July 2023. This is to ensure that by 2028 Welsh is much more audible and visible in local communities and used by more people in their daily lives.</p> <p>Actions include promoting the benefits of bilingualism/ language awareness to young families and all new comers into NPT; providing homework support to pupils of non-Welsh speaking families attending Welsh medium schools; exploring reasons for limited take up/ access to Welsh language courses/ education amongst specific communities;</p>	<p>the increased use of the Welsh language amongst the resident population of NPT.</p>	<p>include policy provisions to support growth in the use of the Welsh language.</p>	<p>objectives relating to the protection of the Welsh language.</p>

SEA Topic	Baseline Key Characteristics	Existing Objectives, Issues and Problems	Implications for NPT LDP Review	Implications for ISA
	<p>providing language awareness and training courses for teaching and non-teaching staff supporting and promoting the use of Welsh in social settings and in workplaces; and working with partners to increase the visibility of Welsh across leisure, business and cultural locations, activities and events.</p> <p>According to the 2021 Census, around 13.5% of people over the age of three in NPT can speak Welsh – a decrease from the 2011 Census when the percentage was 15.3% (a</p>			

SEA Topic	Baseline Key Characteristics	Existing Objectives, Issues and Problems	Implications for NPT LDP Review	Implications for ISA
	picture reflected across most of Wales),			
(10) Landscape	<b>Designated areas:</b> As detailed within <b>Table A.1</b> above there no AONBs within NPT, but 2 NNRs and 6 SLAs have also been designated at a local level.	There is a need to provide appropriate protection for designated landscapes, important landscape features and sensitive landscape character areas. There is also a need to protect key views and safeguard visual amenity.	Any RLDP resulting from this LDP Review should set out a spatial strategy, policies and proposals which protect and enhance key landscape features, improve the quality of the local landscape character, are sensitive to relevant visual receptors and encourage local distinctiveness. The RLDP should also ensure that new developments are well integrated with existing	The ISA Framework should include objectives relating to landscape features, landscape character and visual impacts. The SEA should assess the impacts of emerging spatial strategies, proposals, policies and guidance on these aspects to ensure that the LDP Review safeguards and where appropriate

SEA Topic	Baseline Key Characteristics	Existing Objectives, Issues and Problems	Implications for NPT LDP Review	Implications for ISA
			communities to create a strong sense of place	enhances the level of protection afforded to the landscape.
(10) Landscape	<p><b>Landscape fabric, character and capacity:</b> NPT covers an area of some 442 square kilometres.</p> <p>NPT has a varying landscape, ranging from sand dunes and coastal salt marsh through to upland areas of purple moor grass and ancient woodlands. There are several conifer plantations and important geological features including glaciated valleys and rock formations.</p>	<p>There is a need to provide appropriate protection for designated landscapes, important landscape features and sensitive landscape character areas. There is also a need to protect key views and safeguard visual amenity.</p>	<p>Any RLDP resulting from this LDP Review should set out a spatial strategy, policies and proposals which protect and enhance key landscape features, improve the quality of the local landscape character, are sensitive to relevant visual receptors and encourage local distinctiveness. The RLDP should also ensure that new developments are well</p>	<p>The ISA Framework should include objectives relating to landscape features, landscape character and visual impacts. The SEA should assess the impacts of emerging spatial strategies, proposals, policies and guidance on these aspects to ensure that the LDP Review safeguards</p>

SEA Topic	Baseline Key Characteristics	Existing Objectives, Issues and Problems	Implications for NPT LDP Review	Implications for ISA
	<p>The Valleys are comprised of river valleys separated by upland plateaus and mountains. The settlement pattern and land use reflect the typical ribbon type associated with this area.</p> <p>NPT is seen to be traversed by the M4 motorway, A465 trunk road and the Swansea- Paddington railway line, which all influence the surrounding landscape.</p>		<p>integrated with existing communities to create a strong sense of place</p>	<p>and where appropriate enhances the level of protection afforded to the landscape.</p>
(10) Landscape	<p><b>Visual amenity:</b> Visual amenity is adversely impacted in places by high levels of deprivation, resulting in buildings and infrastructure not being well</p>	<p>There is a need to provide appropriate protection for designated landscapes, important landscape</p>	<p>Any RLDP resulting from this LDP Review should set out a spatial strategy, policies and proposals which protect and enhance</p>	<p>The ISA Framework should include objectives relating to landscape features, landscape character</p>

SEA Topic	Baseline Key Characteristics	Existing Objectives, Issues and Problems	Implications for NPT LDP Review	Implications for ISA
	<p>maintained. Several windfarms are operational in NPT, with the potential to result in visual effects.</p>	<p>features and sensitive landscape character areas. There is also a need to protect key views and safeguard visual amenity.</p>	<p>key landscape features, improve the quality of the local landscape character, are sensitive to relevant visual receptors and encourage local distinctiveness. The RLDP should also ensure that new developments are well integrated with existing communities to create a strong sense of place</p>	<p>and visual impacts. The SEA should assess the impacts of emerging spatial strategies, proposals, policies and guidance on these aspects to ensure that the LDP Review safeguards and where appropriate enhances the level of protection afforded to the landscape.</p>

## **A.4 Evolution of Baseline Conditions in the Absence of the LDP Review**

A.4.1 This section responds to the requirement within the SEA Regulations to consider the likely evolution of the current state of the environment in the absence of the plan or programme under consideration, namely LDP Review.

### **The Need for the LDP Review**

A.4.2 NPTC has determined that a review of the existing LDP (2011-2026, adopted January 2016) is needed to allow NPTC to prepare and adopt a RLDP prior to the end of the current LDP period. The NPT LDP Review Report (NPTC, 2020) concludes that the 'Full Review' procedure is needed to undertake a comprehensive review of the existing LDP and prepare a RLDP, as opposed to the 'Short Form' procedure which would only result in minor revisions (e.g. changes to the wording of individual policies or the addition of individual allocated sites) to the existing LDP. It is considered that a RLDP is needed to take account of a range of new Acts, policy frameworks, initiatives, evidence and spatial issues at national, regional and local levels since the adopted of the current LDP.

A.4.3 In the absence of any LDP Review taking place, NPTC would be unable to either prepare a RLDP (as proposed) or propose minor revisions to the existing LDP before the end of the current LDP period in December 2026. The timetable in the draft DA (October 2023) has adoption of the RLDP scheduled for April 2027, which would leave a period of several months where there would be no adopted LDP in place. The NPT LDP Review Report (NPTC, 2020) references, in the absence of an up to date Development Plan, the potential for there to be pressure from the development industry to try and bring sites forward that are not in accordance with the existing LDP's economic regeneration-led strategy. At present, there is limited demand for house building in NPT, with housing targets not being achieved, therefore, it is not anticipated that in the short period that the Council would be without an adopted Development Plan there would be significant pressure for development, however, there is a potential risk that there could be pressure to release greenfield sites in unsustainable locations. Whilst this demand could be limited, if it did occur, it could result in a range of unacceptable adverse effects on the environmental topics prescribed within Schedule 2 of the SEA Regulations, including:

- Biodiversity, Flora & Fauna: Increased development pressure in unsustainable locations or contrary to the LDP strategy could put pressure on biodiversity, including the loss and fragmentation of habitats, whilst increases in traffic and noise could disturb sensitive species;
- Population: Increased development pressure in unsustainable locations or contrary to the LDP strategy could result in a spatial mismatch between housing supply and demand for public service provision, economic opportunities and transport infrastructure. It could also result in the inability of public services and community infrastructure to meet identified population needs, including in relation to the demands of an ageing population;
- Health: The absence of a competent and up to date LDP would restrict NPTC's ability to improve the physical and mental health of the population through spatial planning policies and interventions. If significant increases in physical activity and active travel are not achieved, health issues including obesity, inactivity and poor air quality will continue to affect the population of the NPTC area, causing increases in ill-health, exacerbating health inequalities and restricting life expectancy. The absence of the LDP Review would also prevent NPTC from fully implementing the WBFGA 2015 and in particular from discharging the public sector duty under Section 3 of the Act, as there would be no mechanism available to align NPTC's planning policy framework with the objectives specified within the NPT We Want (Well-being Plan 2018-2023). Additionally, increased development pressure in unsustainable locations or contrary to the LDP strategy could lead to the loss of areas of open space, reducing opportunities for physical activity, with associated adverse health outcomes;
- Soil: Increased development pressure in unsustainable locations or contrary to the LDP strategy could prevent contaminated land from being remediated and result in the irreversible loss of important soil resources (e.g. high quality peatland). In the absence of an up-to-date LDP spatial strategy, increased pressure for the development of new facilities, housing and employment generating uses could also lead to the loss of the best quality and locally important agricultural land;

- Water: Increased development pressure in unsustainable locations or contrary to the LDP strategy could put pressure on water resources and adversely affect the quality of the water environment;
- Air Quality & Climatic Factors: Dependency on private cars to access employment and services could increase if development takes places in unsustainable locations or contrary to the LDP strategy. Additionally, opportunities to pro-actively encourage transport modal shift to walking, cycling and public transport would be lost. In the absence of a major short-term shift towards the use of electric vehicles, the resulting increase in traffic would increase fossil fuel combustion, carbon emissions and local atmospheric pollution, in particular greater release of particulate matter. This would act against wider policy efforts to decarbonise key economic sectors including transport mitigate climate change. It could also lead to worsening air quality and result in NPTC requiring to designate additional AQMAs to address areas of poor air quality;
- Material Assets: Increased development pressure in unsustainable locations or contrary to the LDP strategy would be likely to increase pressure and capacity constraints on a range of essential infrastructure. This could itself result in a range of environmental effects as well as restricting long term housing, economic and employment growth across NPT. In short, without the LDP Review it is likely that a range of infrastructure required to meet identified needs across NPT would not be delivered;
- Cultural Heritage: Increased development pressure in unsustainable locations or contrary to the LDP strategy could add pressure to sensitive areas of historic and/or archaeological interest, as well as undermining the character of conservation areas; and,
- Landscape: Increased development pressure in unsustainable locations or contrary to the LDP strategy could have a significant negative impact on the landscape character of NPT, especially if additional new development were to be concentrated within areas of high landscape value (e.g. within the existing 6 SLAs across NPT).

A.4.4 In addition, in the absence of having a competent and up to date statutory Development Plan, NPTC's planning resources may need to be diverted away from development planning activities in pursuit of preparing a new LDP towards resisting undesirable 'planning by appeal' cases. It is therefore expedient for NPTC to undertake the LDP Review.

**Use of the Full or Short Form LDP Review Procedure**

A.4.5 In the event that the Short Form procedure was used instead of the Full Review procedure for this LDP Review, any resulting changes to the existing LDP would be limited in scope. This would prevent the LDP from fully taking account of the range of new Acts, policy frameworks, initiatives, evidence and spatial issues at national, regional and local levels which have emerged since January 2016. The resulting adverse environmental effects are likely to be similar to, albeit not as severe as, those listed above in relation to the potential absence of a competent statutory Development Plan for NPT.

A.4.6 The LDP Review is therefore being undertaken in accordance with the 'Full Review' procedure to allow NPTC to prepare a comprehensive and up to date RLDP.

## Appendix B: Review of Plans and Programmes

### B.1. Introduction

B.1.1. This Appendix supports Section 3 of the NPT LDP Review ISA Scoping Report by providing a review of relevant qualifying plans, programmes and strategies of relevance to the LDP Review. The main purpose of this review is to identify relevant environmental protection objectives and wider policy requirements within relevant policy documents which should be taken account of within (or otherwise inform) the LDP Review and this associated ISA process.

### B.2. Review of Relevant Plans and Programmes

B.2.1. **Table B.1** below sets out a review of other plans and programmes of relevance to the LDP Review and the associated ISA process. This review will be updated as required throughout the LDP Review process to take account of emerging policy developments and it will be appended to each iteration of the NPT LDP Review ISA Report. Of note, **Table B.1** does not consider the implications of Welsh national planning policy documents for the LDP Review; rather, these are addressed separately within **Table B.2** given their central importance in determining the soundness of the replacement LDP which will result from the LDP Review.

B.2.2. In terms of the **possible impacts of the UK's withdrawal from the European Union as of 31<sup>st</sup> December 2020**, **Table B.1** includes all relevant international plans and programmes of relevance to the LDP Review. At this time all European legislation of indirect relevance to the NPT LDP Review has been retained within **Table B.1**. While this is subject to change over the course of the preparation of the RLDP, some idea of the direction of future change can be gathered from the National Assembly for Wales Climate Change, Environment and Rural Affairs Committee has set out Environmental principles and governance post-Brexit (October 2019). This, the Committee's second report to consider the effect of the UK's departure from the European Union on environmental principles and governance structures in Wales, set out a series of recommendations for the WG's future Bill to address environmental principles and governance gaps. In

summary the Committee has recommended 'non-regression' or 'progression' as a principle of a future Bill and for the inclusion of the EU's four core environmental principles: Precautionary; Preventative; Rectification at source; and Polluter-pays principle while assessing the benefits of including other EU and international principles.

B.2.3. As of 1<sup>st</sup> January 2021, the UK Government committed to the maintaining of environmental standards and international obligations, stating that the following will remain in place:

- The UK's legal framework for enforcing domestic environmental legislation by UK regulatory bodies or court systems; and
- environmental targets currently covered by EU legislation - they are already covered in UK legislation.

B.2.4. In addition, Wales's Special Protection Areas (SPA) and Special Areas of Conservation (SAC) (Natura 2000 sites) have been confirmed to have the same protections they had when the UK was part of the European Union.

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

**International:**

<b>SEA Topic</b>	<b>Relevant Plans, Programmes and Strategies</b>	<b>Overview of Purpose and Key Requirements</b>	<b>Implications for NPT LDP Review</b>	<b>Implications for ISA</b>
Population (including relevant socio-economic issues)	United Nations (2016) Habitat III (Quinto), United Nations Economic Commission for Europe (1998) The Aarhus Convention.	These documents provide an international framework for promoting sustainable development within all decision making. National and local developments should take sustainability into account and openly share relevant information to the public.	Any RLDP resulting from this LDP Review should set out policies, proposals, advice and guidance which furthers the delivery of sustainable development and safeguards transparency in decision making. The LDP Review process itself must also be objective, transparent, evidence based and conducted fairly.	Applied as a whole, the ISA Framework should provide a holistic suite of assessment criteria to determine the contribution of any RLDP to the delivery of sustainable development.

<b>SEA Topic</b>	<b>Relevant Plans, Programmes and Strategies</b>	<b>Overview of Purpose and Key Requirements</b>	<b>Implications for NPT LDP Review</b>	<b>Implications for ISA</b>
Human Health	United Nations (1989) UN convention on the Rights of the Child 1989, United Nations (2016) Committee on the Rights of the Child Recommendations Report, World Health Organization (1999) Guidelines for Community Noise 1999, World Health Organisation (2004) Children's Environment and Health Action Plan for Europe.	These documents provide an international framework which recognises the importance of the preservation and protection of human health when undertaking development activities.	Any RLDP resulting from this LDP Review should set out policies, proposals, advice and guidance for the prevention of negative effects to human health from local developments in line with international legislations.	The ISA Framework should include objectives relating to the protection of human health.
Biodiversity, Flora & Fauna	The Ramsar Convention on Wetlands (1971), EU Biodiversity Strategy - Our Life Insurance, Our Nature Capital:	These documents provide an international framework to protect sites designated at the	Any RLDP resulting from this LDP Review should set out policies, proposals, advice and guidance for	The ISA Framework must include objectives relating to the appropriate

SEA Topic	Relevant Plans, Programmes and Strategies	Overview of Purpose and Key Requirements	Implications for NPT LDP Review	Implications for ISA
	<p>An EU Biodiversity Strategy (2011), AEWA (1995) Convention on the Agreement on the Conservation of African – Eurasian Migratory Water birds (The Bonn Convention), UNESCO (1973) Convention on International Trade in Endangered Species of Wild Fauna and Flora, United Nations (1992) The Rio Convention on Biodiversity.</p>	<p>international level for reasons of biodiversity conservation and important species from harm.</p>	<p>the avoidance of effects on biodiversity when allocating sites for redevelopment activities.</p>	<p>conservation, protection and enhancement of designated sites.</p>
Soil & Land	<p>United Nations (2001) Stockholm Convention on Persistent Organic Pollutants.</p>	<p>This convention aims to reduce the production and use of persistent organic pollutants.</p>	<p>Any RLDP resulting from this LDP Review should set out policies, proposals, advice and guidance for the objective of ensuring</p>	<p>The ISA Framework should include objectives relating to the restriction of</p>

SEA Topic	Relevant Plans, Programmes and Strategies	Overview of Purpose and Key Requirements	Implications for NPT LDP Review	Implications for ISA
			that all development activities restrict the use of these pollutants.	Persistent Organic Pollutants.
Water	United Nations (1982) Convention on Law of the Sea.	This convention demonstrates the rights and responsibilities of nations for fair use of the world's oceans.	Any RLDP resulting from this LDP Review should set out policies, proposals, advice and guidance for the objective of ensuring that all development activities adhere with the conventions guidelines.	The ISA Framework should include objectives pertaining to the protection of coastal areas and the avoidance of negative effects on the sea caused by development.
Air	WHO Air Quality Guidelines, United Nations (1979) Geneva Convention on Long Range Transboundary Air Pollution.	These guidelines provide a scientific assessment of the health impacts of Air Pollution and provides	Any RLDP resulting from this LDP Review should set out policies, proposals, advice and guidance for	The ISA Framework should include objectives relating to local air quality and

SEA Topic	Relevant Plans, Programmes and Strategies	Overview of Purpose and Key Requirements	Implications for NPT LDP Review	Implications for ISA
		guidelines applicable worldwide for various pollutants.	acceptable levels of Air Quality and proximity of communities to developments which may cause unacceptable levels of air quality.	associated health impacts.
Climatic Factors	Kyoto Protocol to the UN Convention on Climate Change, The United Nations Framework Convention on Climate Change, United Nations (2009) The Copenhagen Accord, United Nations (2010) Cancun Adaptation Framework, United	These documents provide an international framework which identifies the need for climate change mitigation and adaptation action.	Any RLDP resulting from this LDP Review should set out policies, proposals, advice and guidance for the mitigation of climate change effects caused by development and meet the key requirements as outlined by the policies.	The ISA Framework should include objectives relating to energy use, resource efficiency, sustainable transport, GHG emissions and climate change

SEA Topic	Relevant Plans, Programmes and Strategies	Overview of Purpose and Key Requirements	Implications for NPT LDP Review	Implications for ISA
	Nations (2016) Paris Agreement.			mitigation within the NPTC area.
Material Assets	United Nations (1989) Basel Convention.	This convention seeks to reduce the movements of hazardous waste between nations and the amounts/toxicity of waste generated.	Any RLDP resulting from this LDP Review should set out policies, proposals, advice and guidance for the reduction in toxic waste generated.	The ISA Framework should include objectives relating to resource efficiency, land use, waste management, energy, connectivity and accessibility.
Cultural Heritage	World Cities Culture Report 2015 – measures and cultural assets, UNESCO (1972) Convention Concerning the Protection of the World Cultural	These documents provide an international framework to identify and protect historic assets. They aim to ensure the	Any RLDP resulting from this LDP Review should set out policies, proposals, advice and guidance for the protection, preservation	The ISA Framework should include objectives relating to the preservation, conservation,

SEA Topic	Relevant Plans, Programmes and Strategies	Overview of Purpose and Key Requirements	Implications for NPT LDP Review	Implications for ISA
	and Natural Heritage, UNESCO (2001) Convention on the Protection of Underwater Cultural Heritage.	historic assets have a function in the community and are integrated into various planning programmes.	and presentation of historic assets as set out in international policy.	protection and enhancement of the historic environment.
Landscape	N/A			
Interrelated Effects	Johannesburg Declaration on Sustainable Development, Communication COM (2005) 666: Taking Sustainable use of resources forward, United Nations (1992) The Rio Declaration on Environment and Development, United Nations (2002) The World	Commits the sustainable use of resources and promotes sustainable development.	Any RLDP resulting from this LDP Review should set out policies, proposals, advice and guidance for the promotion of sustainable development.	The ISA Framework should include guidance for achieving sustainable development goals.

<b>SEA Topic</b>	<b>Relevant Plans, Programmes and Strategies</b>	<b>Overview of Purpose and Key Requirements</b>	<b>Implications for NPT LDP Review</b>	<b>Implications for ISA</b>
	Summit on Sustainable Development.			

European: As a result of Brexit on 31/12/20 all relevant European law has now been incorporated into domestic UK law. Limited European legislation which remains of indirect relevance is outlined below.

<b>SEA Topic</b>	<b>Relevant Plans, Programmes and Strategies</b>	<b>Overview of Purpose and Key Requirements</b>	<b>Implications for NPT LDP Review</b>	<b>Implications for ISA</b>
Biodiversity, Flora & Fauna	Council of Europe (1981) Convention on the Conservation of European Wildlife and Natural Habitats - The Bern Convention, EU Birds Directive (Directive 2009/147/EC/ on the conservation of wild birds), EU Habitats Directive (EU Directive 92/43/EEC on the conservation of natural habitats and of wild fauna and flora (As amended by 97/62/EC)).	These documents provide a European framework to protect sites designated at the European level for reasons of biodiversity conservation and important species from harm.	Any RLDP resulting from this LDP Review should set out policies, proposals, advice and guidance for the protection of biodiversity in accordance with European legislation & policy.	The ISA Framework should include appropriate objectives to assess potential habitat loss, recreational impacts, water abstraction, pollution and disturbance effects from policies, proposals, advice and guidance contained within any replacement LDP resulting from the LDP Review.

<b>SEA Topic</b>	<b>Relevant Plans, Programmes and Strategies</b>	<b>Overview of Purpose and Key Requirements</b>	<b>Implications for NPT LDP Review</b>	<b>Implications for ISA</b>
Water	<p>EU Water Framework Directive (Directive 2000/60/EC), EU Floods Directive (Directive 2007/60/EC), European Commission (2006) Groundwater Directive 2006/118/EC, European Commission (1991) The Urban Waste Water Directive 91/271/EEC, European Commission (1998) The Drinking Water Directive 98/83/EC, European Commission (2006) The Bathing Waters</p>	<p>These documents provide a European framework which seek to protect the quality of the water environment, including through ensuring safe levels for bathing and drinking water and by promoting sustainable urban drainage.</p>	<p>Any RLDP resulting from this LDP Review should set out policies, proposals, advice and guidance for mitigating flood risk, protecting the drinking water supply and the protection of the community from unsafe water levels.</p>	<p>The ISA Framework should include objectives relating to the quality of the water environment and water resources, as well as to manage flood risks.</p>

SEA Topic	Relevant Plans, Programmes and Strategies	Overview of Purpose and Key Requirements	Implications for NPT LDP Review	Implications for ISA
	Directive 2006/7/EC, European Commission (2008) Marine Strategy Framework Directive 2008/56/EC.			
Climatic Factors	EU (2009) Renewable Energy Directive (2009/28/EC), A Resource Efficient Europe, United Nations (1994), European Commission (2001) National Emissions Ceiling Directive 2001/81/EC, European Commission (2007) The Integrated Climate and Energy Package, European	These documents provide a European framework to respond to the global challenge of climate change. Primarily, the minimisation of future climate change through mitigation and the implementation of	Any RLDP resulting from this LDP Review should set out policies, proposals, advice and guidance for the avoidance of contributing factors of climate change.	The ISA Framework should include objectives for the reduction of negative environmental effects from local development.

<b>SEA Topic</b>	<b>Relevant Plans, Programmes and Strategies</b>	<b>Overview of Purpose and Key Requirements</b>	<b>Implications for NPT LDP Review</b>	<b>Implications for ISA</b>
	Commission (2012) Energy Efficiency Directive (2012/27/EU), European Commission (2014) 2030 Policy Framework for Climate and Energy.	adaptation measures are key themes.		

National (UK) - all legislative and policy frameworks are informed by relevant higher level European and international frameworks

SEA Topic	Relevant Plans, Programmes and Strategies	Overview of Purpose and Key Requirements	Implications for NPT LDP Review	Implications for ISA
Population (including relevant socio-economic issues)	The Enterprise and Regulatory Reform Act 2013, The Plan for Growth (BIS, 2011), Equality Act 2010, Local Growth: Realising every Place's potential (BIS, 2010), HM Government (2013) Aviation Policy Framework.	These documents provide a framework at the UK level to promote strong, sustainable and balanced growth across all economies. They aim to encourage investment and create an equal opportunity environment.	Any replacement RLDP resulting from this LDP Review should set out policies, proposals, advice and guidance for the promotion of sustainable growth within the NPTC area for the benefit of its resident population.	The ISA Framework should include guidelines pertaining to achieving economic growth as designated by national policy.
Human Health	The Marmot Review, The Health and Social Care Act (2012), Child Obesity Plan (2016), Health Protection	These documents provide a framework at the UK level to reduce health inequalities and make	Any RLDP resulting from this LDP Review should set out policies, proposals, advice and	The ISA Framework should include objectives relating to tackling health issues

<b>SEA Topic</b>	<b>Relevant Plans, Programmes and Strategies</b>	<b>Overview of Purpose and Key Requirements</b>	<b>Implications for NPT LDP Review</b>	<b>Implications for ISA</b>
	<p>Agency (2007) Children’s Environment and Health Action Plan, Health Protection Agency (2008) Health Effects of Climate Change in the UK 2008 - An update of the department of Health report 2001/2002, Health Protection Agency (2009) Health Strategy for the United Kingdom 2, Health and Safety Executive (2009) The Health and Safety of Great Britain: Be Part of the Solution, Sustainable Development</p>	<p>improvements to public health while promoting active lifestyles.</p>	<p>guidance for access to good quality health services as set out in International and European legislation.</p>	<p>and creating adequate health and safety guidelines.</p>

<b>SEA Topic</b>	<b>Relevant Plans, Programmes and Strategies</b>	<b>Overview of Purpose and Key Requirements</b>	<b>Implications for NPT LDP Review</b>	<b>Implications for ISA</b>
	Commission (2010) Sustainable Development: The Key to Tackling Health Inequalities.			
Biodiversity, Flora & Fauna	The UK Post 2010 Biodiversity Framework (JNCC, 2012), The Protection of Badgers Act 1992, The Natural Environment White Paper (DEFRA, 2012), Natural Environment and Rural Communities Act (2006), The Conservation of Habitats and Species Regulations (The	These documents provide a framework at the UK level to provide protection for protected species and habitats.	Any RLDP resulting from this LDP Review should set out policies, proposals, advice and guidance for protection of protected habitats and species, including any special protection areas.	The ISA Framework should include objectives relating to national policy on the protection of Biodiversity, flora and fauna.

SEA Topic	Relevant Plans, Programmes and Strategies	Overview of Purpose and Key Requirements	Implications for NPT LDP Review	Implications for ISA
	<p>Conservation of Habitats and Species Regulations (2010) and amendments (2012)), 25 Year Environment Plan (UK Government, 2018), Defra (2007) Conserving Biodiversity the UK Approach 2007, Defra, Scottish Government, WG (2008) The Invasive and Non-Native Species Framework Strategy for Great Britain, HM Government (1981) Wildlife and Countryside Act, HM</p>			

SEA Topic	Relevant Plans, Programmes and Strategies	Overview of Purpose and Key Requirements	Implications for NPT LDP Review	Implications for ISA
	Government (1990) Environmental Protection Act, HM Government (2010) Conservation of Habitats & Species Regulations 2010 (as amended 2011), HM Government (2010) Environmental Permitting (England and Wales) Regulations, Joint Nature Conservation Committee and Defra (2012) UK Post-2010 Biodiversity Framework, Strategic Plan for Biodiversity 2011-2020 (2010), UK National			

SEA Topic	Relevant Plans, Programmes and Strategies	Overview of Purpose and Key Requirements	Implications for NPT LDP Review	Implications for ISA
	<p>Ecosystem Assessment (2011) UK National Ecosystem Assessment: Understanding Nature's Value to Society.</p>			
Soil & Land	<p>Guiding Principles for Land Contamination, HM Government (1986) Agriculture Act (with numerous revisions) 1986.</p>	<p>These documents provide a framework at the UK level to identify and remediate contaminated land, as well as regarding the management of agricultural land.</p>	<p>Any RLDP resulting from this LDP Review should set out policies, proposals, advice and guidance for the protection of agricultural assets and land contamination policies.</p>	<p>The ISA Framework should include objectives relating to contaminated land remediation, soil quality and pollution to ground receptors. Consequential human health and ecological risks and impacts should also be</p>

SEA Topic	Relevant Plans, Programmes and Strategies	Overview of Purpose and Key Requirements	Implications for NPT LDP Review	Implications for ISA
				considered in a holistic manner.
Water	<p>The Pitt Review: Learning Lessons from the 2007 Floods (2008), Flood and Water Management Act (2010), Defra (2005) Safeguarding Sea Life, Defra (2007) Fisheries 2027: A long-term vision for sustainable fisheries, Defra (2009) Our Seas – a Shared Resource: High Level Marine Objectives, Defra (2010) Adapting to Coastal Change: Developing a</p>	<p>These documents provide a framework at the UK level regarding flood risk management and the protection of water and coastal environments.</p>	<p>Any RLDP resulting from this LDP Review should set out policies, proposals, advice and guidance relating to coastal preservation and management and flood risk within the NPTC area.</p>	<p>The ISA Framework should include objectives relating to marine guidelines for cleaner oceans and provide flood risk mitigation.</p>

SEA Topic	Relevant Plans, Programmes and Strategies	Overview of Purpose and Key Requirements	Implications for NPT LDP Review	Implications for ISA
	<p>Policy Framework, Defra (2012) Marine Strategy Part 1: UK Initial Assessment and Good Environmental Status, DECC (2010) Marine Energy Action Plan, Department for Transport (2007) Ports Policy Review Interim Report, Department for Transport (2011) National Policy Statement for Ports, Environment Agency (2005) Cleaner Coasts, Healthier Seas: EA Marine Strategy, Environment Agency (2013)</p>			

SEA Topic	Relevant Plans, Programmes and Strategies	Overview of Purpose and Key Requirements	Implications for NPT LDP Review	Implications for ISA
	Groundwater Protection Policy and Practice (GP3), HM Government (1973) The Protection of Wrecks Act 1973, HM Government (2003) The Water Environment (Water Framework Directive) (England and Wales) Regulations 2017, HM Government (2007) Offshore Marine Conservation (Natural Habitats, &c.) Regulations 2007 (as amended 2010), HM Government (2009)			

SEA Topic	Relevant Plans, Programmes and Strategies	Overview of Purpose and Key Requirements	Implications for NPT LDP Review	Implications for ISA
	Flood Risk Regulations, HM Government (2009) The Marine and Coastal Access Act, HM Government (2010) Marine Strategy Framework Directive - putting in place the legal framework for implementation, HMG, NI Executive, Scottish Government, WG (2011) UK Marine Policy Statement, Inshore Fisheries and Conservation Authorities Bylaws (various), Natural England and JNCC (2011) Marine			

SEA Topic	Relevant Plans, Programmes and Strategies	Overview of Purpose and Key Requirements	Implications for NPT LDP Review	Implications for ISA
	<p>Conservation Zone (MCZ) Project, NERC (2010) Marine Environmental Mapping Programme (MAREMAP), UK Marine Monitoring and Assessment Strategy (2010) Charting Progress 2: The State of UK Seas.</p>			
Air	<p>The Air Quality Standards Regulations (2010) as amended, Air Quality Strategy for England, Scotland, Wales and Northern Ireland, UK's Air Quality Action Plan (Defra,</p>	<p>These documents provide a framework at the UK level to implement objectives for the reduction of air pollution.</p>	<p>Any RLDP resulting from this LDP Review should set out policies, proposals, advice and guidance relating to the preservation of acceptable levels of air</p>	<p>The ISA Framework should include objectives pertaining to the protection and enhancement of local air quality and the</p>

SEA Topic	Relevant Plans, Programmes and Strategies	Overview of Purpose and Key Requirements	Implications for NPT LDP Review	Implications for ISA
	<p>revised January 2016), The Environment Act (1995), Defra (2010) Air Pollution: Action in a Changing Climate, Defra (2011) Air Quality Plans for the Achievement of EU Air Quality Limit Values for Nitrogen Dioxide (NO<sub>2</sub>) in the UK: List of UK and National Measures.</p>		<p>quality during local development in the NPTC area.</p>	<p>minimisation of air pollution.</p>
Climatic Factors	<p>The Carbon Plan (DECC, 2011), Committee on Climate Change (2008) Building a Low-Carbon Economy - the UK's</p>	<p>These documents provide a framework at the UK level regarding the need to mitigate and adapt to climate change. In</p>	<p>Any RLDP resulting from this LDP Review should set out policies, proposals, advice and guidance for the</p>	<p>The ISA Framework should include objectives relating to renewable energy use, resource efficiency,</p>

SEA Topic	Relevant Plans, Programmes and Strategies	Overview of Purpose and Key Requirements	Implications for NPT LDP Review	Implications for ISA
	<p>Contribution to Tackling Climate, DECC (2009) UK Ports for the Offshore Wind Industry: Time to Act, DECC (2011) Carbon Plan: Delivering our Low Carbon Future,, DECC (2009) Framework for the Development of Clean Coal, DECC (2011) National Policy Statements for Energy Infrastructure, DECC (2011) UK Renewable Energy Roadmap, DECC (2014) UK National Energy Efficiency</p>	<p>particular, the Climate Change Act 2008 sets a legally binding target of reducing the UK’s GHG emissions by 80% by 2050 compared with 1990 and requires a programme of rolling carbon budgets to be set to achieve this.</p>	<p>prevention of environmental effects caused by local redevelopment and the pursuit of renewable energies where possible.</p>	<p>sustainable transport, GHG emissions and climate change mitigation.</p>

SEA Topic	Relevant Plans, Programmes and Strategies	Overview of Purpose and Key Requirements	Implications for NPT LDP Review	Implications for ISA
	Action Plan, Environment Agency (2010) Managing the Environment in a Changing Climate, HM Government (1998) Petroleum Act, HM Government (2006) The Stern Review: The Economics of Climate Change, HM Government (2008) Climate Change Act 2008, HM Government (2008) The Energy Act, HM Government (2015) Ozone-Depleting Substances Regulations 2015, HM			

SEA Topic	Relevant Plans, Programmes and Strategies	Overview of Purpose and Key Requirements	Implications for NPT LDP Review	Implications for ISA
	Government (2017) UK Climate Change Risk Assessment.			
Material Assets	The National Infrastructure Plan (2011), HM Treasury (2014) National Infrastructure Plan, Reducing and Managing Waste Policy (DEFRA, 2013, Waste Incineration (England and Wales) Regulations 2002, The Environmental Permitting (England and Wales) (Amendment) Regulations 2016, The Waste Electronic	These documents provide a framework at the UK level regarding infrastructure development, environmental permitting, waste management and energy generation.	Any RLDP resulting from this LDP Review should set out policies, proposals, advice and guidance for the efficient use of material assets, the deployment of renewable and low carbon energy generation sources and sustainable waste management within the NPTC area.	The ISA Framework should include objectives relating to resource efficiency, land use, waste management, energy, connectivity and accessibility.

SEA Topic	Relevant Plans, Programmes and Strategies	Overview of Purpose and Key Requirements	Implications for NPT LDP Review	Implications for ISA
	Equipment (Amendment) Regulations SI 2010/1155 amending The Waste Electrical and Electronic Equipment (WEEE) (Waste Management Licensing) (England and Wales) Regulations 2006, The Hazardous Waste Regulations 2005 (England and Wales), The Waste Regulations 2011 (England and Wales), Landfill Regulations 2002 (England and Wales, amended 2005), Waste and Emissions			

SEA Topic	Relevant Plans, Programmes and Strategies	Overview of Purpose and Key Requirements	Implications for NPT LDP Review	Implications for ISA
	<p>Trading Act 2003 (Amended), National Planning Policy for Waste (DCLG, 2014), Meeting the Energy Challenge: A White Paper on Energy (DECC, 2007), The UK Renewable Energy Strategy (HM Government, 2009), Defra (2012) National Policy Statement for Waste Water, HM Government (1995) Environment Act 1995.</p>			
Cultural Heritage	<p>Heritage Protection for the 21st Century: White Paper (DCMS, 2007), The Ancient</p>	<p>These documents provide a framework at the UK level regarding the</p>	<p>Any RLDP resulting from this LDP Review should set out policies,</p>	<p>The ISA Framework should include objectives relating to the</p>

SEA Topic	Relevant Plans, Programmes and Strategies	Overview of Purpose and Key Requirements	Implications for NPT LDP Review	Implications for ISA
	<p>Monuments and Archaeological Areas Act 1979, The Planning (Listed Buildings and Conservation Areas) Act 1990, HM Government (1979) Ancient Monuments and Archaeological Areas Act 1979, HM Government (1996) The Treasure Act 1996.</p>	<p>protection and conservation of cultural and historic assets, including listed buildings, ancient monuments and archaeological resources.</p>	<p>proposals, advice and guidance for the protection and promotion of cultural and historic assets in the NPTC area.</p>	<p>protection, enhancement, conservation and preservation of assets.</p>
Landscape	<p>Hedgerow Regulations 1997, Natural Environment and Rural Communities Act (2006), HM Government (1949) National Parks and</p>	<p>These documents provide a framework at the UK level regarding the protection of national parks, countryside and</p>	<p>Any RLDP resulting from this LDP Review should set out policies, proposals, advice and guidance for the</p>	<p>The ISA Framework should include objectives relating to landscape features,</p>

SEA Topic	Relevant Plans, Programmes and Strategies	Overview of Purpose and Key Requirements	Implications for NPT LDP Review	Implications for ISA
	<p>Access to the Countryside Act 1949, HM Government (1967) Forestry Act 1967, HM Government (2000) Countryside and Rights of Way Act 2000, HM Government (2006) Commons Act 2006.</p>	<p>rural communities including rights of way and protection of forests.</p>	<p>protection of landscapes and hedgerows, including protected areas within the NPTC area.</p>	<p>landscape character and visual impacts.</p>
<p>Interrelated Effects</p>	<p>The UK Sustainable Development Strategy (HM Government, 2005), National Planning Policy Framework (DCLG, 2012), Planning Practice Guidance, Defra (2011) Mainstreaming Sustainable</p>	<p>These documents provide a framework at the UK level to promote sustainable development and sustainable transport initiatives.</p>	<p>Any RLDP resulting from this LDP Review should set out policies, proposals, advice and guidance for the promotion of sustainable</p>	<p>The ISA Framework should include objectives relating to sustainable development targets.</p>

SEA Topic	Relevant Plans, Programmes and Strategies	Overview of Purpose and Key Requirements	Implications for NPT LDP Review	Implications for ISA
	Development, Department for Transport (2008) Delivering a Sustainable Transport System, HM Government (1990) Planning (Listed Buildings and Conservation Areas) Act 1990, HM Government (2000) Transport Act 2000, HM Government (2006) Government of Wales Act 2006, HM Government (2017) The Wales Act, Royal Town Planning Institute (2017) Digital Economy and Town		development in the NPTC area.	

<b>SEA Topic</b>	<b>Relevant Plans, Programmes and Strategies</b>	<b>Overview of Purpose and Key Requirements</b>	<b>Implications for NPT LDP Review</b>	<b>Implications for ISA</b>
	Planning, Sustainable Development Commission (2005) One Future – Different Paths. Shared Framework for Sustainable Development.			

National (Wales) - all legislative and policy frameworks are informed by relevant higher-level UK, European and international frameworks

SEA Topic	Relevant Plans, Programmes and Strategies	Overview of Purpose and Key Requirements	Implications for NPT LDP Review	Implications for ISA
Population (including relevant socio-economic issues)	Well Being of Future Generations (Wales) Act 2015, Housing (Wales) Act, 2014 Growth and Competitiveness Commission (2016) Our Valleys, Our Future (July 2017), WG Future Trends Report (2017), The Strategy for Older People in Wales: Living Longer, Ageing Well (2013-2023 (WG), Social Services and Well-being (Wales) Act 2014, WGWG	These policies are informed by International, European and UK policies and broadly focus on progressive agendas for increasing economic growth and enhancing social wellbeing in Wales.	Any RLDP resulting from this LDP Review should set out policies, proposals, advice and guidance relating to relevant socio-economic and population issues within the NPTC area.	The ISA Framework should include objectives relating to the creation of acceptable policies for the benefit of the population. The quality of social services, job provision, equality legislation and economic growth targets should be considered in a holistic manner.

SEA Topic	Relevant Plans, Programmes and Strategies	Overview of Purpose and Key Requirements	Implications for NPT LDP Review	Implications for ISA
	(2007) One Wales – A Progressive Agenda for the Government of Wales, WG (2009) Getting On Together - a Community Cohesion Strategy for Wales, WG (2009) Improving Lives and Communities – Homes in Wales, WG (2006) Play Policy Implementation Plan, WG (2009) Farming, Food and Countryside: Building a Secure future – A New Strategy for Farming, WG (2009) Living Well Living Independent Lives, WG			

SEA Topic	Relevant Plans, Programmes and Strategies	Overview of Purpose and Key Requirements	Implications for NPT LDP Review	Implications for ISA
	(2010) Economic Renewal: A New Direction, WG (2010) Food for Wales, Food from Wales 2010:2020, WG (2010) Fulfilled Lives, Supportive Communities, WG (2010) Welsh Medium Education Strategy 2010, WG (2011) Sustainable Social Services for Wales: A Framework for Action, WG (2011) Rights of Children and Young Persons (Wales) Measure 2011, WG (2013) Partnership for Growth: The WG Strategy for Tourism			

SEA Topic	Relevant Plans, Programmes and Strategies	Overview of Purpose and Key Requirements	Implications for NPT LDP Review	Implications for ISA
	2013 – 2020, WG (2013) Vibrant and Viable Places New Regeneration Framework, WG (2013) The Strategy for Older People in Wales 2013-2023, WG (2013) Framework for Action on Independent Living, WG (2014) Declaration of Rights for Older People, WG (2014) Housing (Wales) Act 2014, WG (2015) Green Growth Wales: Investing in the Future, WG (2015) Child Poverty Strategy for Wales, WG (2015) Volunteering			

SEA Topic	Relevant Plans, Programmes and Strategies	Overview of Purpose and Key Requirements	Implications for NPT LDP Review	Implications for ISA
	<p>Policy, Supporting Communities, Changing Lives, WG (2016) Strategic Equalities Plan, WG (2016) Social Services: The national outcomes framework for people who need care and support and carers who need support, WG (2016) Early Years Outcomes Framework, WG (2017) Prosperity for All :The National Strategy, WG 2015/16 Review of evidence of inequalities in Wales, WG Future Trends Report</p>			

SEA Topic	Relevant Plans, Programmes and Strategies	Overview of Purpose and Key Requirements	Implications for NPT LDP Review	Implications for ISA
	<p>(2017),; WG Population Projections (2018); Innovation Strategy for Wales (February 2023); Building Better Places (July 2020); Smarter working: a remote working strategy for Wales (March 2022); Children and Young People’s Plan (March 2022).</p>			
Human Health	<p>The Active Travel (Wales) Act (2015), Children’s Commissioners for Wales (2016) Annual Report 15-16, (2017) Public Health (Wales) Act 2017, NHS</p>	<p>These documents provide a framework at the Welsh level to improve the physical and mental health of the population.</p>	<p>Any RLDP resulting from this LDP Review should set out policies, proposals, advice and guidance for key health</p>	<p>The ISA Framework should include objectives relating to adequate health provisions for all</p>

SEA Topic	Relevant Plans, Programmes and Strategies	Overview of Purpose and Key Requirements	Implications for NPT LDP Review	Implications for ISA
	Wales (2011) Together for Health, Public Health Wales (2015) A Healthier, Happier and Fairer Wales, WG (2008) Designed to Add Value - a third dimension for One Wales, WG (2009) Rural Health Plan, WG (2010) Setting the Direction: Primary & Community Services Strategic Delivery Programme, WG (2006) Climbing Higher – A Strategy for Sport and Physical Activity, WG (2012) Working Differently –		provisions and targets within the NPTC area.	communities regardless of location.

SEA Topic	Relevant Plans, Programmes and Strategies	Overview of Purpose and Key Requirements	Implications for NPT LDP Review	Implications for ISA
	Working Together, WG (2012) Together for Mental Health: A Strategy for Mental Health and Wellbeing in Wales, WG (2013) A Noise Action Plan for Wales 2013-2018, WG/ NHS (2016) Measuring the health and well-being of a nation: Public Health Outcomes Framework for Wales; Environment (Air Quality and Soundscapes) (Wales) Bill (March 2023);			

SEA Topic	Relevant Plans, Programmes and Strategies	Overview of Purpose and Key Requirements	Implications for NPT LDP Review	Implications for ISA
Biodiversity, Flora & Fauna	Environment (Wales) Act, 2016, (2009) Environmental Damage (Prevention and Remediation) (Wales) Regulations 2009, Wales Biodiversity Partnership (2010) Wales Biodiversity Framework, WG (2009) Woodlands for Wales Strategy, WG (2015) The Nature Recovery Plan for Wales – Setting the course for 2020 and beyond.	These documents provide a framework at the Welsh level to protect biodiversity interests, including designated sites and important species.	Any RLDP resulting from this LDP Review should set out policies, proposals, advice and guidance for the protection of biodiversity, flora and fauna within the NPTC area.	The ISA Framework should include objectives relating to the preservation, protection and conservation efforts of biodiversity levels.
Soil & Land	Environment (Wales) Act, 2016, Joint Nature	These documents provide a framework at the Welsh	Any RLDP resulting from this LDP Review should	The ISA Framework should include

SEA Topic	Relevant Plans, Programmes and Strategies	Overview of Purpose and Key Requirements	Implications for NPT LDP Review	Implications for ISA
	<p>Conservation Committee (ongoing) Geological Conservation Review, Welsh Assembly (2012) Contaminated Land (Wales) (Amendment) Regulations 2012, The Nitrate Pollution Prevention (Wales) Regulations.</p>	<p>level regarding the avoidance and remediation of contaminated land and the creation of a geological profile of Wales.</p>	<p>provide policies, proposals, advice and guidance for local developments which may be taking place on protected areas or contaminated land.</p>	<p>objectives relating to contaminated land remediation, soil quality and pollution to ground receptors. Consequential human health and ecological risks and impacts should also be considered in a holistic manner.</p>
Water	<p>Environment (Wales) Act, 2016, Countryside Council for Wales (now Natural Resources Wales - NRW) (2015) National Seascape Assessment for Wales,</p>	<p>These documents provide a framework at the Welsh level regarding the management of coastal and river areas, marine renewable energies,</p>	<p>Any RLDP resulting from this LDP Review should provide policies, proposals, advice and guidance for local developments which may</p>	<p>The ISA Framework should include objectives relating to the quality of the water environment and water</p>

SEA Topic	Relevant Plans, Programmes and Strategies	Overview of Purpose and Key Requirements	Implications for NPT LDP Review	Implications for ISA
	LUC, NRW, Environment Agency (2015) The Severn River Basin Management Plan Natural Resources Wales (2015) Dee River Basin Management Plan, Natural Resources Wales (2015) Welsh Coastal Tourism Strategy (WG, 2008), Interim Marine Aggregates Dredging Policy (WG, 2007), Coastal Access Improvement Programme (WG, 2007) Making the Most of Wales' Coast: The Integrated	surface water management and coastal tourism.	be affected by rising water levels, poor flood risk management or may be assisted by coastal and tourism strategies in the NPTC area.	resources, as well as to manage flood risks.

SEA Topic	Relevant Plans, Programmes and Strategies	Overview of Purpose and Key Requirements	Implications for NPT LDP Review	Implications for ISA
	Coastal Zone Management Strategy for Wales (WG, 2008), Wales Fisheries Strategy (WG, 2011) Strategic Policy Position on Water (WG, 2011) Marine Renewable Energy Strategic Framework, WG (2013) National Flood and Coastal Erosion Strategy for Wales, WG (2013) Wales Marine and Fisheries Strategic Action Plan WG (2015) The Welsh National Marine Plan, WG (2019) Water Strategy for Wales, WG (2015) Wales			

SEA Topic	Relevant Plans, Programmes and Strategies	Overview of Purpose and Key Requirements	Implications for NPT LDP Review	Implications for ISA
	<p>Marine Evidence Report, Welsh Water (2008) Surface Water Management Strategy, Welsh Water (2014) Final Water Resources Management Plan, Welsh Regional Coastal Groups, SMP 20 Lavernock Point to St Ann's Head (South Wales), The Nitrate Pollution Prevention (Wales) Regulations.</p>			
Air	<p>Air Quality Standards (Wales) Regulations (2010); Environment (Air Quality</p>	<p>This document provides a framework at the Welsh level regarding the protection and</p>	<p>Any RLDP resulting from this LDP Review should provide policies, proposals, advice and</p>	<p>The ISA Framework should include objectives relating to air quality and air pollution</p>

SEA Topic	Relevant Plans, Programmes and Strategies	Overview of Purpose and Key Requirements	Implications for NPT LDP Review	Implications for ISA
	and Soundscapes) (Wales) Bill (March 2023).	improvement of air quality in accordance with limits set within European legislative.	guidance for appropriate levels of local air quality management within the NPTC area.	controls, as well as provide acceptable air quality levels for health purposes.
Climatic Factors	Environment (Wales) Act, 2016, Committee on Climate Change (2017) UK Climate Change Risk Assessment 2017 Evidence Report, Summary for Wales, Re-Energising Wales Project, WG (2006) Environment Strategy for Wales, WG (2010) Climate Change Strategy for Wales, WG (2010), Capturing the	These documents provide a framework at the Welsh level to respond to the need to mitigation and adapt to climate change. The framework focuses on seeking to decarbonise key economic sectors, encouraging low carbon energy generation and	Any RLDP resulting from this LDP Review should provide policies, proposals, advice and guidance for the prevention of environmental effects caused by local redevelopment and the pursuit of renewable energies where possible.	The ISA Framework should include objectives relating to renewable energy use, resource efficiency, sustainable transport, GHG emissions and climate change mitigation within the NPTC area.

SEA Topic	Relevant Plans, Programmes and Strategies	Overview of Purpose and Key Requirements	Implications for NPT LDP Review	Implications for ISA
	<p>Potential: A Green Jobs Strategy for Wales, WG (2010), Low Carbon Revolution – the WG Energy Policy Statement, WG (2011) Policy Statement: Preparing for a Changing Climate, WG (2011) Preparing Wales for Climate Change: Adaptation Delivery Plan, WG (2012) Energy Wales: A Low Carbon Transition, WG (2014) Energy Wales: A Low Carbon Transition Delivery Plan, WG (2016)</p>	<p>enhancing the reliance of the natural environment.</p>		

SEA Topic	Relevant Plans, Programmes and Strategies	Overview of Purpose and Key Requirements	Implications for NPT LDP Review	Implications for ISA
	<p>Environment (Wales) Act 2016. Energy Generation in Wales: 2021 (November 2022); Net Zero Wales: Carbon Budget 2 (2021 – 2025).</p>			
Material Assets	<p>HM Government (2010) Waste (Wales) Measure 2010, NRW (2015) LIFE Natura 2000 Programme for Wales NRW (2016) State of Natural Resources Report (SoNaRR), Sustainable Development Commission (2009) Low Carbon Wales, WG (2008) One Wales:</p>	<p>These documents provide a framework at the Welsh level regarding the protection of natural resources, infrastructure development strategies and investment plans, and transport strategies and policies.</p>	<p>Any RLDP resulting from this LDP Review should provide policies, proposals, advice and guidance for the enhancement and protection of material assets within the NPTC area.</p>	<p>The ISA Framework should include objectives relating to waste regulations, protection of natural resources, resource management and green growth.</p>

SEA Topic	Relevant Plans, Programmes and Strategies	Overview of Purpose and Key Requirements	Implications for NPT LDP Review	Implications for ISA
	Connecting the Nation, WG (2008) Wales Transport Strategy, WG (2010) Towards Zero Waste One Wales: One Planet. The Overarching Waste Strategy Document for Wales, WG (2012) Sustaining a Living Wales: A Green Paper on a New Approach to Natural Resource Management in Wales, WG (2012) Wales Infrastructure Investment Plan, WG (2013) Active Travel (Wales) Act, WG (2015) Green Growth			

SEA Topic	Relevant Plans, Programmes and Strategies	Overview of Purpose and Key Requirements	Implications for NPT LDP Review	Implications for ISA
	<p>Wales: Local Energy, WG (2016) Active Travel Action Plan for Wales, WG (2016) Energy Efficiency in Wales: A Strategy for the Next 10 years 2016-2026, WG (2017) Natural Resources Policy, Active Travel Act (Wales) 2013.</p>			
Cultural Heritage	<p>Environment (Wales) Act 2016, Historic Environment (Wales) Act 2016, Valuing the Welsh Historic Environment WG (2010), Welsh Language (Wales) Measure 2011, Cymraeg</p>	<p>These documents provide a framework at the Welsh level regarding the protection of cultural heritage; including historic</p>	<p>Any RLDP resulting from this LDP review should provide policies, proposals, advice and guidance for the protection, preservation and presentation of</p>	<p>The ISA Framework should include objections relating to the protection of historic assets.</p>

SEA Topic	Relevant Plans, Programmes and Strategies	Overview of Purpose and Key Requirements	Implications for NPT LDP Review	Implications for ISA
	<p>2050 A million Welsh speakers, WG, WG (2017), Light Springs through the Dark: A vision for culture in Wales (2016); Cymraeg 2050: Welsh Language Strategy Action Plan 2022 – 2023 (March 2022); Cymraeg 2050: Our Plan for 2021 to 2026.</p>	<p>assets and the use of the Welsh language.</p>	<p>cultural heritage and where possible, the inclusion of the Welsh language wherever relevant in the NPTC area.</p>	
Landscape	<p>Environment (Wales) Act 2016, Countryside Council for Wales (now NRW) (2001) Register of Landscapes of Historic Interest, Natural Resources</p>	<p>These documents provide a framework at the Welsh level regarding the protection and mapping of natural resources, protected and important</p>	<p>Any RLDP resulting from this LDP Review should provide policies, proposals, advice and guidance for the preservation of protected</p>	<p>The ISA Framework should include objectives relating to landscape features,</p>

SEA Topic	Relevant Plans, Programmes and Strategies	Overview of Purpose and Key Requirements	Implications for NPT LDP Review	Implications for ISA
	Wales (ongoing) LANDMAP Programme.	landscapes of historic interest.	landscapes and natural resources within the NPTC area.	landscape character and visual impacts.
Interrelated Effects	Environment (Wales) Act, 2016, Historic Environment (Wales) Act 2016, (2015) Planning (Wales) Act 2015, WG (2008) People, Places, Future Wales 2040: The National Plan (2021), WG (2009) One Wales: One Planet, A New Sustainable Development Scheme for Wales (2018), WG Future Trends Report (2017), WG (2011) Rural Development	<p>These documents provide a framework at the Welsh level regarding sustainable urban and rural development, city regional development and spatial planning.</p> <p>Building Better Places emphasises the importance of a plan-led and placemaking approach</p>	Any RLDP resulting from this LDP Review should provide policies, proposals, advice and guidance for adhering to sustainable development guidelines where possible within the NPTC area.	The ISA Framework should include objectives relating to sustainable development targets.

SEA Topic	Relevant Plans, Programmes and Strategies	Overview of Purpose and Key Requirements	Implications for NPT LDP Review	Implications for ISA
	<p>Plan for Wales (2014-2020), WG (2012) City Regions Final Report, WG (2016) PPW– Edition 11, WG (2016) WG Programme for government, Taking Wales Forward 2016-2021, WG: Wales We Want National Conversation, Reforming Local Government: Resilient and Renewed – WG Whitepaper (Jan 2017); Building Better Places (2020).</p>	<p>to recovery in light of the Covid-19 pandemic.</p>		

Regional (Proposed SDP Level)

SEA Topic	Relevant Plans, Programmes and Strategies	Overview of Purpose and Key Requirements	Implications for NPT LDP Review	Implications for ISA
Interrelated effects	Swansea Bay City Deal (2017), Emerging Strategic South West Wales Strategic Development Plan, Regional Technical Statement (RTS) 2nd Review (2020) NRW - South West Wales Area Statement 2020.	<p>The Swansea Bay City Deal is a £1.3bn investment in 11 major projects across the Swansea Bay City Region across Carmarthenshire, NPT, Pembrokeshire and Swansea. The City Deal is being funded, subject to the approval of project business cases, by the UK Government, the WG, the public sector and the private sector.</p> <p>The Swansea Bay City Deal aims to boost the regional economy by £1.8bn and</p>	<p>The preparation of any RLDP will need to be closely aligned with the preparation of the South West Wales SDP and the South Wales Regional Aggregate Working Parties RTS to ensure that once adopted, both documents provide a coherent framework for effectively and efficiently addressing relevant planning issues.</p> <p>The preparation of any RLDP will therefore need to</p>	<p>A separate SA/SEA process will need to be undertaken for the emerging South West Wales SDP once the lead Responsible Authority for the preparation of this plan has been determined. As with this LDP Review, SA/SEA Scoping will be needed to set an assessment framework prior to the development of substantive SPD components.</p>

SEA Topic	Relevant Plans, Programmes and Strategies	Overview of Purpose and Key Requirements	Implications for NPT LDP Review	Implications for ISA
		<p>generate up to 10,000 jobs. It is being led by the four regional local authorities: Carmarthenshire Council, Swansea Council, NPT Council and Pembrokeshire Council - together with the Abertawe Bro Morgannwg and Hywel DDA University Health Boards, Swansea University, the University of Wales Trinity Saint David, and private sector partners.</p> <p>It has focuses on four themes:</p> <ol style="list-style-type: none"> <li>1. Internet of Economic Acceleration;</li> </ol>	<p>align with the planned provision of aggregates with that for housing, to ensure that housing plans are not thwarted by an under-provision of aggregates.</p> <p>The South West Wales Area Statement provides a collaboratively developed identification of the key environmental challenges faced in the South West Wales Area. It identifies key thematic issues which the NPT RLDP needs to</p>	<p>The ISA Framework proposed for use in the ISA of the LDP Review (Section 5) should be kept under review and tested for compatibility against the SA Framework for the South West SPD once this has been produced.</p> <p>The South West Wales Area Statement should inform the ISA framework and be kept under review as the ISA is developed through the RLDP process.</p>

SEA Topic	Relevant Plans, Programmes and Strategies	Overview of Purpose and Key Requirements	Implications for NPT LDP Review	Implications for ISA
		<p>2. Internet of Life Science &amp; Wellbeing;</p> <p>3. Internet of Energy; and,</p> <p>4. Smart Manufacturing;</p> <p>At the time of writing, local planning authorities have been invited to consider the development of Strategic Development Plans in addition to their own LDP reviews currently being undertaken. 4 SPDs are proposed to cover North Wales, Mid Wales, South East Wales and South West Wales.</p>	<p>consider and build into the Review. It usefully provides a clear regional understanding of the key issues faced by NPT and its neighbours in the region and provides data sources which will be updated as the RLDP process progresses.</p>	

SEA Topic	Relevant Plans, Programmes and Strategies	Overview of Purpose and Key Requirements	Implications for NPT LDP Review	Implications for ISA
		<p>Under the provisions set out in Mineral Technical Advice Note 1 (MTAN1): Aggregates, the South Wales Regional Aggregates Working Party (SWRAWP) must prepare an RTS setting out how demand for aggregates will be met in the region across a 15-year period. The RTS assesses the supply and demand of aggregates in each Mineral Planning Authority (MPA) area, setting out each MPA's contribution to meeting regional demand. The</p>		

SEA Topic	Relevant Plans, Programmes and Strategies	Overview of Purpose and Key Requirements	Implications for NPT LDP Review	Implications for ISA
		<p>SWRAWP 2<sup>nd</sup> Review was published for consultation in August 2019, setting out the demand for primary land-won aggregates in the South Wales sub regions at 12.486 mtpa. NPT is part of the Swansea City- Sub-Region on which calculations are based on two 'theoretical' options (i.e. only one of two options/datasets would be used to calculate demand). These are split into Option A (historical sales) and Option B (housing requirements from each LPA).</p>		

SEA Topic	Relevant Plans, Programmes and Strategies	Overview of Purpose and Key Requirements	Implications for NPT LDP Review	Implications for ISA
		<p>Based on historical sales across the South Wales region (option A), 0.611 mtpa of aggregate will be required from NPT to meet ongoing demand.</p> <p>Based on housing requirements outlined in the existing LDP and calculated against the demand across the South Wales region, 0.347 mtpa would be required from NPT would be required to meet demand across the region.</p>		

SEA Topic	Relevant Plans, Programmes and Strategies	Overview of Purpose and Key Requirements	Implications for NPT LDP Review	Implications for ISA
		<p>Taking into account the differences in provision of types of aggregate across all local authorities in the South Wales region, Preferred Annualised Apportionment for NPT has been calculated at 0.305 mtpa.</p> <p>NRW has produced its first Area Statements (2020). Each Area Statement outlines the key challenges facing that particular locality, what we can all do to meet those challenges, and how we can better manage our natural</p>		

<b>SEA Topic</b>	<b>Relevant Plans, Programmes and Strategies</b>	<b>Overview of Purpose and Key Requirements</b>	<b>Implications for NPT LDP Review</b>	<b>Implications for ISA</b>
		<p>resources for the benefit of future generations. They will be updated regularly and improved year-on-year.</p> <p>Viewed together, the seven Area Statements can be seen as a collaborative response to what is known as the Natural Resources Policy, published by the WG in 2017, which sets out the key challenges and opportunities for the sustainable management of Wales's natural resources into the future.</p>		

SEA Topic	Relevant Plans, Programmes and Strategies	Overview of Purpose and Key Requirements	Implications for NPT LDP Review	Implications for ISA
		<p>NPT is located within the South West Wales Area Statement. This Area Statement identifies the key risks, opportunities and priorities that we all need to address to build the resilience of our ecosystems and support sustainable management of the natural resources. It sets out actions that NRW and its partners, will take forward to address the issues they have identified.</p> <p>The themes for South West Wales are:</p>		

SEA Topic	Relevant Plans, Programmes and Strategies	Overview of Purpose and Key Requirements	Implications for NPT LDP Review	Implications for ISA
		<p>Reducing health inequalities - This theme aims to examine the opportunities to address health inequalities in South West Wales by using natural resources and habitats;</p> <p>Ensuring sustainable land management - Ensuring our land is sustainably managed for future generations;</p> <p>Reversing the decline of, and enhancing, biodiversity - This theme aims to explore how we can reverse the decline of biodiversity by building</p>		

<b>SEA Topic</b>	<b>Relevant Plans, Programmes and Strategies</b>	<b>Overview of Purpose and Key Requirements</b>	<b>Implications for NPT LDP Review</b>	<b>Implications for ISA</b>
		resilient ecological networks; and,  Cross-cutting theme: Mitigating and adapting to a changing climate – This cross-cutting theme looks at how we can adapt and respond to a changing climate.		

Local (NPTC & Neighbouring Local Authorities) - all legislative and policy frameworks are informed by relevant higher-level Welsh, UK, European and international frameworks.

SEA Topic	Relevant Plans, Programmes and Strategies	Overview of Purpose and Key Requirements	Implications for NPT LDP Review	Implications for ISA
Population (including relevant socio-economic issues)	NPT Strategic School Improvement Programme (NPTC, 2018). NPT We Want (Well-being Plan 2018 – 2023), Aging Well in NPT Plan, NPT Public Services Board Assessment of Local Well-being May 2017, NPT Single Integrated Plan 2013-2023, NPTC Corporate Plan 2019-2022, NPT Welsh in Education Strategic Plan	<p>The Corporate Plan covers the period 2022-2027, and sets out how the Council will approach recovery from the Covid-19 pandemic in the short, medium and longer term. It sets out the council’s strategic change programme for the next five years, and is centred on four well-being objectives:</p> <ol style="list-style-type: none"> <li>1) All children get the best start in life;</li> </ol>	Any RLDP resulting from this LDP Review should provide policies, proposals, advice and guidance relating to the wellbeing and the prosperity for the community in the NPTC area.	The ISA Framework should include objectives relating to the creation of acceptable policies for the benefit of the population. The quality of social services, job provision, equality legislation and economic growth targets should be considered in a holistic manner.

SEA Topic	Relevant Plans, Programmes and Strategies	Overview of Purpose and Key Requirements	Implications for NPT LDP Review	Implications for ISA
	<p>[WESP] 2017 – 2020, NPTC Local Housing Strategy 2015-20, NPTC Homelessness Strategy 2018-22, Swansea Bay City Region Economic Regeneration Strategy 2013-2030, NPT Strategic Equality Plan 2015-2019, NPTC Local Development Strategy, Port Talbot Waterfront Enterprise Zone, NPT Digital Strategy (2018-2022) 'Smart &amp; Connected', NPT Tourism Development</p>	<p>2) All communities are thriving and sustainable;</p> <p>3) Our local environment, culture and heritage can be enjoyed by future generations; and</p> <p>4) Local people are skilled and access high quality, green jobs.</p> <p>Additionally, other local policies regarding socio-economic issues broadly address the following themes: Improving quality of life for all;</p>		

SEA Topic	Relevant Plans, Programmes and Strategies	Overview of Purpose and Key Requirements	Implications for NPT LDP Review	Implications for ISA
	<p>Action Plan, NPT Destination Management Plan; NPT Corporate Plan 2022 – 2027: Recover, Reset, Renew; NPT Economic Recovery Plan (February 2022).</p>	<p>Protecting and enhancing the environment;</p> <p>Increasing prosperity;</p> <p>Delivering safer and more inclusive communities;</p> <p>Achieving a healthier County Borough; and,</p> <p>Ensure good quality housing.</p> <p>The NPT Public Services Board Wellbeing Assessment (2017) summaries the challenges to Economic, Environmental and Social Wellbeing affecting residents of the NPTC area, as required</p>		

SEA Topic	Relevant Plans, Programmes and Strategies	Overview of Purpose and Key Requirements	Implications for NPT LDP Review	Implications for ISA
		<p>under the Wellbeing of Future Generations (Wales) Act 2015.</p> <p>Informed by the Wellbeing Assessment, the NPT We Want (Wellbeing Plan 2018-2023) identifies policy changes and actions to improve the health and wellbeing of the population within NPT:</p> <ul style="list-style-type: none"><li>• To support children in their early years, especially children at risk of adverse childhood experiences;</li></ul>		

SEA Topic	Relevant Plans, Programmes and Strategies	Overview of Purpose and Key Requirements	Implications for NPT LDP Review	Implications for ISA
		<ul style="list-style-type: none"><li>• Create safe, confident and resilient communities, focussing on vulnerable people;</li><li>• Put more life into our later years - Ageing Well;</li><li>• Promote well-being through work and in the workplace;</li><li>• Valuing green infrastructure and the contribution it makes to Well-being; and,</li></ul>		

SEA Topic	Relevant Plans, Programmes and Strategies	Overview of Purpose and Key Requirements	Implications for NPT LDP Review	Implications for ISA
		<ul style="list-style-type: none"> <li>Tackling digital exclusion.</li> </ul> <p>The NPT We Want (Wellbeing Plan 2018-2023) also sets out wellbeing objectives for the NPTC area, particularly,</p> <p>Develop the local economy and environment.</p>		
Human Health	NPT Council’s Plan for Adult Social Care 2019-2022, NPT Active Travel ‘Existing Route Map’ (ERM) and Integrated Route Map (IRM), NPT Health, Social Care &	<p>The health policies relevant to NPTC address issues encompassing social inclusion, lifestyle and health and social care.</p> <p>The NPT Wellbeing Assessment summarises the</p>	Any RLDP resulting from this LDP review should provide policies, proposals, advice and guidance relating to healthcare targets set by NPTC in their LDP area.	The ISA Framework should include objectives relating to tackling health issues and creating adequate health and safety guidelines.

SEA Topic	Relevant Plans, Programmes and Strategies	Overview of Purpose and Key Requirements	Implications for NPT LDP Review	Implications for ISA
	<p>Wellbeing Strategy, NPTC Strategic Delivery Plan for Mental Health Services (2018), NPT We Want (Well-being Plan 2018 – 2023), Aging Well in NPT Plan, NPT Public Services Board Assessment of Local Well-being May 2017.</p>	<p>challenges to Economic, Environmental and Social Wellbeing for residents in NPT in accordance with the Wellbeing of Future Generations (Wales) Act 2015. Informed by the Wellbeing Assessment, the NPT Public Services Board ‘The NPT We Want’ (Well-Being Plan 2018-2023) provides key statistics to inform future local development plans, including:</p> <p>The promotion of health lifestyles including regular exercise;</p>		

SEA Topic	Relevant Plans, Programmes and Strategies	Overview of Purpose and Key Requirements	Implications for NPT LDP Review	Implications for ISA
		<p>Addressing poor lifestyle choices and childhood poverty;</p> <p>Addressing health inequalities within the NPTC area, including differences in life and health life expectancy; and,</p> <p>Improve access to healthcare facilities.</p> <p>The NPT We Want (Wellbeing Plan 2018-2023) also sets out wellbeing objectives for the NPTC area, particularly,</p> <p>Improve the well-being of children and young people; and,</p>		

SEA Topic	Relevant Plans, Programmes and Strategies	Overview of Purpose and Key Requirements	Implications for NPT LDP Review	Implications for ISA
		<p>Improve the well-being of all adults.</p>		
<p>Biodiversity, Flora &amp; Fauna</p>	<p>NPT Biodiversity Duty Plan (2017), NPT Local Biodiversity Action Plan (LBAP); NPT Biodiversity Duty Plan 2020 – 2023;</p>	<p>The local biodiversity action plan and duty plans aim to map/quantify biodiversity and identify its importance for the NPTC area.</p> <p>The Biodiversity Action Plan Objectives include requirements such as:</p> <ul style="list-style-type: none"> <li>• Embedding biodiversity into decision making at all levels;</li> <li>• Safeguarding species and habitats of principal</li> </ul>	<p>Any RLDP resulting from this LDP review should provide policies, proposals, advice and guidance to protect biodiversity, flora and fauna and its habitats from being destroyed by local development.</p>	<p>The ISA Framework should include objectives relating to conservation, protection and enhancement of biodiversity interests.</p>

SEA Topic	Relevant Plans, Programmes and Strategies	Overview of Purpose and Key Requirements	Implications for NPT LDP Review	Implications for ISA
		<p>importance and improve their management;</p> <ul style="list-style-type: none"> <li>• Increasing resilience of our natural environment by restoring degraded habitats and habitat creation;</li> <li>• Tackle key pressures on species and habitats;</li> <li>• Improving our evidence and understanding and monitoring of biodiversity; and</li> <li>• Putting in place a framework for</li> </ul>		

SEA Topic	Relevant Plans, Programmes and Strategies	Overview of Purpose and Key Requirements	Implications for NPT LDP Review	Implications for ISA
		governance and support for delivery.		
Soil & Land	N/A			
Water	NPTC Flood Risk Management Strategy.	The NPTC Flood Risk Management Strategy sets out locally significant flood risk in the NPTC area. The main aim of the strategy is to reduce the social and economic impacts on the local community as a result of flooding while also reducing the overall risk of flooding.	Any RLDP resulting from this LDP review should provide policies, proposals, advice and guidance to protect, prevent and mitigate adverse impacts on flood risk levels as a result of local development.	The ISA Framework should include objectives relating to the reduction of flood risk while guiding local development decisions.

SEA Topic	Relevant Plans, Programmes and Strategies	Overview of Purpose and Key Requirements	Implications for NPT LDP Review	Implications for ISA
Air	NPTC Air Quality Strategy 'Airwise: Clean Air for Everyone' (2017).	This Air Quality Strategy sets out NPTC's approach to tackle air quality issues in the area now and in the future.	Any RLDP resulting from this LDP review should provide policies, proposals, advice and guidance for the protection of air quality and the prevention of adverse impact on local, regional and national air quality standards as a result of development, including industry.	The ISA Framework should include objectives relating to tackling air quality issues.
Climatic Factors	NPT Decarbonisation and Renewable Energy Strategy (2020).	The NPT Decarbonisation and Renewable Energy Strategy sets out the framework to	Any RLDP resulting from this LDP should provide policies, proposals, advice	The ISA Framework should include objectives relating to

SEA Topic	Relevant Plans, Programmes and Strategies	Overview of Purpose and Key Requirements	Implications for NPT LDP Review	Implications for ISA
		<p>achieve the Council's carbon footprint reduction aspirations. It is based around three key themes: transportation, buildings and spaces; and, influencing behaviour.</p>	<p>and guidance relating to climate change mitigation and adaptation. In particular, the LDP Review should plan for upgraded and new infrastructure to support the decarbonisation of key economic sectors within the NPTC area. The RLDP should therefore include a policy framework to support the deployment of renewable energy technologies and heat networks in</p>	<p>climate change mitigation and adaptation.</p>

SEA Topic	Relevant Plans, Programmes and Strategies	Overview of Purpose and Key Requirements	Implications for NPT LDP Review	Implications for ISA
			<p>appropriate locations The RLDP will therefore have a key role in facilitating the implementation of this overarching corporate strategy.</p>	
Material Assets	<p>Joint Local Transport Plan 2015-2020, Regional Waste Plan for the South West Wales Region, NPT Public Services Board Assessment of Local Well-being May 2017, the NPT We Want (Well-being Plan 2018 – 2023).</p>	<p>The Joint Local Transport Plan sets out the transport strategy adopted by four local authorities (Carmarthenshire, NPT, Swansea and Pembrokeshire), replacing original individual plans. It provides a strategic outlook on road traffic reduction, road</p>	<p>Any RLDP resulting from this LDP should provide policies, proposals, advice and guidance relating to the reasoned provision of transport.</p>	<p>The ISA Framework should include objectives relating to the growth of material assets.</p>

SEA Topic	Relevant Plans, Programmes and Strategies	Overview of Purpose and Key Requirements	Implications for NPT LDP Review	Implications for ISA
		<p>safety, public transport, parking, managing the transportation network, and cycling and walking.</p> <p>The regional waste plan policy aims to provide a land use planning framework at the regional level. Each Local Planning Authority (LPA) shall develop which service best suits their needs and manage their own waste.</p> <p>The NPT Wellbeing Assessment (2017) summarises the challenges to Economic, Environmental and</p>		

SEA Topic	Relevant Plans, Programmes and Strategies	Overview of Purpose and Key Requirements	Implications for NPT LDP Review	Implications for ISA
		<p>Social Wellbeing for residents in the NPT area in accordance with the Wellbeing of Future Generations (Wales) Act 2015. Informed by the Wellbeing Assessment, the NPT Public Services Board 'The NPT We Want' (Well-Being Plan 2018-2023) provides key statistics and goals to inform future local development plans, including:</p> <p>Promotion of a wider mix of uses on sites in existing employment areas to stimulate growth;</p>		

SEA Topic	Relevant Plans, Programmes and Strategies	Overview of Purpose and Key Requirements	Implications for NPT LDP Review	Implications for ISA
		<p>Provision of business and management skills training in NPTC; and,</p> <p>Address inequalities faced by people living in the Valleys.</p>		
Cultural Heritage	<p>NPT Public Services Board Assessment of Local Well-being May 2017, the NPT We Want (Well-being Plan 2018 – 2023), NPTC Welsh Language Promotion Strategy.</p>	<p>The NPTC Welsh Language Promotion Strategy describes how NPTC will aim to raise the profile of the Welsh language and culture with its residents and employees.</p> <p>The NPT Wellbeing Assessment (2017) summaries the challenges to Economic, Environmental and Social</p>	<p>Any RLDP resulting from this LDP should provide policies, proposals, advice and guidance relating to the preservation and promotion of the Welsh language and promote the economic, environmental and social wellbeing of the NPTC area.</p>	<p>The ISA Framework should include objectives relating to the preservation of historic assets.</p>

SEA Topic	Relevant Plans, Programmes and Strategies	Overview of Purpose and Key Requirements	Implications for NPT LDP Review	Implications for ISA
		<p>Wellbeing for residents in the NPT area in accordance with the Wellbeing of Future Generations (Wales) Act 2015. Informed by the Wellbeing Assessment, the NPT Public Services Board 'NPT We Want' (Well-Being Plan 2018-2023) provides key statistics and goals to inform future local development plans, including:</p> <p>Work to maximises the benefit of residents of NPTC from cultural, built and natural assets understanding Welsh heritage by mapping sites and</p>		

SEA Topic	Relevant Plans, Programmes and Strategies	Overview of Purpose and Key Requirements	Implications for NPT LDP Review	Implications for ISA
		buildings, promoting the use of the Welsh language; and, promote awareness of the benefits of these assets.		
Landscape	N/A			
Interrelated Effects	NPT Public Services Board Assessment of Local Well-being May 2017, the NPT We Want Well-being Plan (2018 – 2023). NPT Single Integrated Plan 2013-2023.	As noted above, these documents identify a wide-ranging set of socio-economic and wellbeing challenges affecting residents within the NPTC area and identify wellbeing objectives and associated measures to address these.	Any RLDP resulting from this LDP must respond to the locally identified wellbeing objectives and demonstrate compliance with the Wellbeing of Future Generations (Wales) Act 2015.	The ISA Framework should include objectives relating to all aspects of health and wellbeing, including each of the wellbeing objectives defined within the Neath Port Talbot We

<b>SEA Topic</b>	<b>Relevant Plans, Programmes and Strategies</b>	<b>Overview of Purpose and Key Requirements</b>	<b>Implications for NPT LDP Review</b>	<b>Implications for ISA</b>
				Want (Well-being Plan 2018 – 2023).

### **B.3. Review of National Planning Policy Requirements**

B.3.1. **Table B.2** below presents a review of Welsh national planning policies and guidance in order to identify key policy requirements which will need to be taken account of within the LDP Review. National planning policy is presently contained within PPW, comprising of policy themes concerning well-being goals in line with the Wellbeing of Future Generations (Wales) Act 2015 and reflecting the WG strategies and policies. Future Wales 2040 was published by the WG on 24<sup>th</sup> February, setting out the 20-year plan for Wales up to 2040, identifying nationally significant developments. Key policy requirements arising from Future Wales of relevance to the LDP Review are also identified in **Table B.2**.

#### **Future Wales 2040: The National Plan (February 2021)**

B.3.2. In September 2020, the Minister for Housing and Local Government provided a working draft Future Wales National Development Framework , including a Schedule of Changes report, setting out the changes made since consultation was undertaken on the previous draft published in 2019. Future Wales 2040: The National Plan (Future Wales) was then published by the WG on 24<sup>th</sup> February 2021 alongside PPW 11<sup>th</sup> Edition.

B.3.3. Future Wales will be reviewed and updated every five years but provides a twenty-year spatial vision for development in Wales. Future Wales provides a framework to be built upon by Strategic Development Plans (SDPs) and Local Development Plans which themselves will identify the location of infrastructure and development across the country. Future Wales has been reviewed, with the implications described under each SEA Objective in **Table B2**.

#### **Implications of the Covid-19 Pandemic**

B.3.4. Following the onset of the Covid-19 pandemic in early 2020, the preparation of RLDPs was impacted by changes to local authority capacity and resources, the ability to host the traditional LDP consultation events and the ability to adhere to the agreed Delivery Agreement (DA). In response, the WG released a letter on 18<sup>th</sup> March 2020 requesting all Local Planning

Authorities (LPAs) to reflect on their individual circumstances ,providing guidance for LPAs at different stages of RLDP preparation.

- B.3.5. NPTC commenced work on the preparation of the LDP Review Report at the beginning of 2020, completing the 6-week public consultation period on 16<sup>th</sup> March 2020. Following formal approval from NPTC, the LDP Review Report was submitted to the WG in July 2020. The DA was initially approved in 2021, however following the findings of the Call for Candidate Sites, coupled with a need for additional work to be carried out on viability and transport, an new DA has been produced in 2023. This updated DA will set out the review timetable (as required to be approved by WG), the Community Involvement Scheme (CIS) and the NPTC resources which will be committed to developing the RLDP. The finalised timescales for completion of these elements will be confirmed in the final version of the DA, when approved.

#### **Implications of Brexit**

- B.3.6. On 31<sup>st</sup> December 2020, the United Kingdom left the European Union, with implications for legislative geographies taken under review as part of the SA of the emerging NPT LDP. The European Union (Withdrawl) Act 2018 which provides legal continuity, enabling the transposition of directly applicable existing EU law and converting it into UK law, creating a new category of domestic law for the United Kingdom named 'Retained EU Law'. Brexit therefore has implications of the review of European legislative undertaken for this SA which has been addressed in the main policy tables.

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

Approved policy documents

SEA Topic	Relevant Plans, Programmes and Strategies	Overview of Purpose and Key Requirements	Implications for NPT LDP Review	Implications for ISA
Population (including relevant socio-economic issues)	PPW Edition 11 (2021), Future Wales 2040: The National Plan (2021), TAN2: Planning and Affordable Housing (2006), TAN 4: Retail and Commercial Development, WG (2010) TAN6: Planning for Sustainable Rural Communities, WG (2009) TAN 16: Sport, Recreation and Open Space, WG (2014) TAN23: Economic Development, Technical Advice Note (TAN) 13:	These documents require the preparation of LDPs to:  Co-ordinate development with infrastructure provision;  Follow the principles of sustainable development including demonstrating an appropriate consideration to the 'five ways of working' and an improvement in the delivery of all four aspects of wellbeing: social, economic, environmental and cultural;	Any RLDP resulting from this LDP should provide policies, proposals, advice and guidance relating to relevant socio-economic and population issues within the NPTC area.	The ISA Framework should include objectives relating to socio-economic issues including economic competitiveness and economic growth, employment provision, social wellbeing, housing and open space.

SEA Topic	Relevant Plans, Programmes and Strategies	Overview of Purpose and Key Requirements	Implications for NPT LDP Review	Implications for ISA
	<p>Tourism, WG (2013), WG Circular (005/2018): Planning for Gypsy, Traveller and Showpeople Sites (2018), WG 'Prosperity for All': the National Strategy' (2017), WG Valleys Task Force: Our Valleys, Our Future (July 2017); Building Better Places (2020).</p>	<p>Support national, regional, and local economic policies and strategies;</p> <p>Align jobs and services with housing, wherever possible, so as to reduce the need for travel, especially by car;</p> <p>Promote the re-use of previously developed, vacant and underused land;</p> <p>Deliver physical regeneration and employment opportunities to disadvantaged communities;</p> <p>Guide and control economic development to facilitate</p>		

SEA Topic	Relevant Plans, Programmes and Strategies	Overview of Purpose and Key Requirements	Implications for NPT LDP Review	Implications for ISA
		<p>regeneration initiatives and promote environmental and social sustainability;</p> <p>Reflect work with neighbouring authorities and other relevant stakeholders to plan strategically for employment land provision;</p> <p>Be underpinned by an up to date and appropriate evidence base to support policy choices and land allocations for economic development;</p> <p>Set out an evidence based economic vision for the area, including a broad assessment of anticipated employment</p>		

SEA Topic	Relevant Plans, Programmes and Strategies	Overview of Purpose and Key Requirements	Implications for NPT LDP Review	Implications for ISA
		<p>change by broad sector and land use;</p> <p>Provide targets on land provision for the employment uses (Classes B1-B8), showing net change in land/floorspace for offices and industry/warehousing separately, and protect these sites from inappropriate development;</p> <p>Identify strategic employment sites at regional scale by agreement amongst local authorities, giving careful consideration to the attributes of strategic employment sites</p>		

SEA Topic	Relevant Plans, Programmes and Strategies	Overview of Purpose and Key Requirements	Implications for NPT LDP Review	Implications for ISA
		<p>to ensure they provide a differentiated offer across the region;</p> <p>Include policies relating to future development on existing employment sites to protect them from inappropriate development: – to encourage the regeneration and re-use of sites which are still suitable and needed for employment; – to control and manage the release of unwanted employment sites to other uses;</p> <p>Seek to provide the right amount of land and qualitative</p>		

SEA Topic	Relevant Plans, Programmes and Strategies	Overview of Purpose and Key Requirements	Implications for NPT LDP Review	Implications for ISA
		<p>mix of sites to meet the market demand for economic development uses;</p> <p>Propose specific locations for those necessary industries which are detrimental to amenity and may be a source of pollution;</p> <p>Seek to promote and facilitate development that will deliver physical regeneration;</p> <p>Prioritise sites that deliver appropriate job and training opportunities to disadvantaged communities;</p>		

SEA Topic	Relevant Plans, Programmes and Strategies	Overview of Purpose and Key Requirements	Implications for NPT LDP Review	Implications for ISA
		<p>Concentrate development that attracts large numbers of people, including retail and offices, in city, town and village centres;</p> <p>Include criteria-based policies to deal with development not specifically allocated in the development plan and help respond to unexpected change;</p> <p>Include policies on the scope for new economic development in and adjoining rural settlements and identify suitable sites. In remote rural areas and smaller</p>		

SEA Topic	Relevant Plans, Programmes and Strategies	Overview of Purpose and Key Requirements	Implications for NPT LDP Review	Implications for ISA
		<p>settlements, a criteria-based approach should be considered;</p> <p>Include policies encouraging farm diversification and new rural development opportunities;</p> <p>Identify protection zones around establishments that hold hazardous substances and protect the ability of existing establishments to operate or expand by preventing the incremental development of vulnerable uses in the vicinity of such sites;</p>		

SEA Topic	Relevant Plans, Programmes and Strategies	Overview of Purpose and Key Requirements	Implications for NPT LDP Review	Implications for ISA
		<p>Adopt the ‘town centres first’ principle with consideration always given to an existing centre;</p> <p>Establish a local retail hierarchy which identifies the nature, type and strategic role to be performed by retail and commercial centres;</p> <p>Set out measures to reinvigorate particular centres, as appropriate, including linking to centre-wide strategies, masterplans and place plans;</p>		

SEA Topic	Relevant Plans, Programmes and Strategies	Overview of Purpose and Key Requirements	Implications for NPT LDP Review	Implications for ISA
		<p>Promote vibrant, attractive and viable retail and commercial centres;</p> <p>Identify the boundaries of retail and commercial centres contained within the hierarchy on the proposals map;</p> <p>Allocate sites for retail and commercial centre uses where there is assessed to be a quantitative or qualitative need and where size and scale are in accord with the retail strategy. Sites should be identified using the sequential approach and, where</p>		

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		<p>appropriate, assessed for their impact on other centres;</p> <p>Include a criteria-based policy against which proposals coming forward on unallocated sites can be judged;</p> <p>Set out policies for primary and secondary areas, where appropriate;</p> <p>Develop policies which deal flexibly with changes to existing buildings;</p> <p>Include policies relating to future development on existing retail sites to protect</p>		

SEA Topic	Relevant Plans, Programmes and Strategies	Overview of Purpose and Key Requirements	Implications for NPT LDP Review	Implications for ISA
		<p>them from inappropriate development and to control and manage the release of unwanted retail sites to other uses;</p> <p>Monitor the health of retail centres to assess the effectiveness of policies;</p> <p>Locate new commercial, retail, education, health, leisure and public service facilities within town and city centres with good access by public transport to and from the town/city and where appropriate the wider region. .</p> <p>LPA's should work in</p>		

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		<p>partnership with the private sector to identify sites which accord with the sequential approach and are in line with the LDPs retail strategy;</p> <p>Incorporate the new sequential search methodology for identifying housing sites (PPW (2021) paras 3.41 – 3.43);</p> <p>Planning Authorities must use their housing trajectory as the basis for monitoring the delivery of their housing requirement and will form part of the basis for monitoring the delivery of LDP housing</p>		

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		<p>requirements as part of LDP AMRs and for subsequent plan review. The monitoring of housing delivery for AMRs must be undertaken by planning authorities in accordance with the guidance set out in the Development Plans Manual. Under delivery against the trajectory can itself be a reason to review a development plan;</p> <p>Establish a strategic framework for the protection, provision and enhancement of well-designed tourism, sport,</p>		

SEA Topic	Relevant Plans, Programmes and Strategies	Overview of Purpose and Key Requirements	Implications for NPT LDP Review	Implications for ISA
		<p>recreation and leisure facilities in the NPTC area;</p> <p>Protect from development playing fields and open space that has significant amenity or recreational value to local communities;</p> <p>Locate facilities which may generate high levels of travel demand in or close to town centres where possible;</p> <p>Consider the scope to use disused land and routes as parks, linear parks or greenways in urban areas;</p> <p>and,</p>		

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		<p>Encourage the multiple use of open space and facilities, where appropriate, to increase their effective use and reduce the need to provide additional facilities.</p>		
Human Health	<p>PPW 11<sup>th</sup> Edition (2021), Future Wales 2040: The National Plan (2021), WG (1997) TAN11: Noise, Noise and Soundscape Action Plan (2018-2023); Building Better Places (2020).</p>	<p>These documents require the preparation of LDPs to take into account EU limits and target values and WHO guidelines on the detrimental effects of noise on health, including:</p> <p>Taking account of the ‘Agent of Change’ principle in the consideration of adverse impacts upon human health</p>	<p>Any RLDP resulting from this LDP should provide policies, proposals, advice and guidance relating to the protection and promotion of human health within the NPTC area.</p>	<p>The ISA Framework should include objectives relating to all aspects of human health and wellbeing.</p>

SEA Topic	Relevant Plans, Programmes and Strategies	Overview of Purpose and Key Requirements	Implications for NPT LDP Review	Implications for ISA
		<p>caused by air and soundscape quality affected by proposed developments;</p> <p>The prioritisation of active travel modes to assist in achieving the Well-being Goals; and,</p> <p>Support the introduction of Ultra Low Emission Vehicles through the provision of electric vehicle charging infrastructure.</p>		
Biodiversity, Flora & Fauna	PPW 11 <sup>th</sup> Edition (2021), Future Wales 2040: The National Plan (2021), WG (2009) TAN5: Nature	<p>These documents require the preparation of LDPs to:</p> <p>Identify all international, national and local designated</p>	Any RLDP resulting from this LDP should provide policies, proposals, advice and	The ISA Framework should include objectives relating to

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	<p>Conservation and Planning, WG (1997) TAN 10: Tree Preservation Orders, National Natural Resources Policy (NNRP) (2017).</p>	<p>sites (including potential SPAs, candidate SACs and listed Ramsar sites);</p> <p>Provide criteria against which a development affecting the different types of designated site will be assessed, reflecting their relative significance;</p> <p>Include locally-specific policies for the conservation and, where appropriate, enhancement of landscape and amenity;</p> <p>Provide for the conservation and, where appropriate, enhancement of biodiversity</p>	<p>guidance relating to the protection and preservation of biodiversity, flora and fauna in accordance with national planning policy.</p>	<p>biodiversity conservation.</p>

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		<p>and landscape outside designated areas, in particular identifying opportunities to conserve important local habitats and species, and to safeguard and manage landscape features of major importance for nature conservation or amenity;</p> <p>Make appropriate provision for Local Nature Reserves;</p> <p>Include, where appropriate, locally-specific policies for conserving native woodland and protecting and planting trees;</p>		

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		<p>Clarify how biodiversity will be safeguarded outside statutory designated sites without unduly restricting development that is otherwise appropriate;</p> <p>Provide for the protection and enhancement of open space of conservation value, seeking to identify opportunities to promote responsible public access for enjoyment and understanding of the natural heritage where this is compatible with its conservation and existing land uses;</p>		

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		<p>Recognise the potential of and encourage land uses and land management practices that help to secure carbon sinks;</p> <p>Consider the location of fragile habitats and species; and,</p> <p>Encourage the diversification of farm enterprises and other parts of the rural economy for appropriate tourism, sport, recreation and leisure uses, subject to adequate safeguards for the character and appearance of the countryside, particularly its landscape, biodiversity and local amenity value.</p>		

<b>SEA Topic</b>	<b>Relevant Plans, Programmes and Strategies</b>	<b>Overview of Purpose and Key Requirements</b>	<b>Implications for NPT LDP Review</b>	<b>Implications for ISA</b>
Soil & Land	PPW 11 <sup>th</sup> Edition (2021), Future Wales 2040: The National Plan (2021).	<p>These documents require the preparation of LDPs to:</p> <p>Take account of the physical and environmental constraints on development of land, including, for example, the level of contamination and stability;</p> <p>Ensure new development is not undertaken without an understanding of the risks, including those associated with the previous land use, mine and landfill gas emissions, and rising</p>	Any RLDP resulting from this LDP should provide policies, proposals, advice and guidance relating to the safeguarding and efficient use of land and soil resources.	The ISA Framework should include objectives relating to the safeguarding and efficient use of land and soil resources.

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		<p>groundwater from abandoned mines;</p> <p>Ensure new development does not take place without appropriate remediation;</p> <p>Ensure consideration is given to the potential impacts which remediation of land contamination might have upon the natural and historic environments;</p> <p>Ensure new development is not undertaken without an understanding of the risks, including those associated</p>		

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		<p>with subsidence, landslips or rock falls;</p> <p>Ensure development does not take place without appropriate precautions;</p> <p>Take account of coastal / land erosion risks;</p> <p>Seek to restore unstable and contaminated land;</p> <p>Ensure that any proposals for opencast, deep mine development (in wholly exceptional circumstances only) clearly demonstrate why they are needed in the context of climate change emissions</p>		

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		<p>reductions targets and for reasons of national energy security; and,</p> <p>Take account of the requirement to provide a Health Impact Assessment to accompany any applications for opencast coal working.</p>		
Water	<p>PPW 11<sup>th</sup> Edition (2021), Future Wales 2040: The National Plan (2021); WG (1998) TAN14: Coastal Planning, WG (2004); TAN15: Development and Flood Risk; Implementation of Schedule 3 to the Flood and Water Management Act 2010: the</p>	<p>These documents require the preparation of LDPs to:</p> <p>Take account of the key role of flooding in strategic decision making on locations for growth and new infrastructure;</p>	<p>Any RLDP resulting from this LDP should provide policies, proposals, advice and guidance relating to the protection and enhancement of water quality, water</p>	<p>The ISA Framework should include objectives relating to the protection and enhancement of water quality, water resources and the water environment.</p>

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	<p>Mandatory Use of Sustainable Drainage Systems (SuDS) (2019). Welsh National Marine Plan (2019).</p> <p>TAN 15: Development and Flood Risk is currently under review by the WG, and an update to this document has been delayed due to consultee responses. In the interim period, layers available on NRW's 'Flood Map for Planning' should be used.</p>	<p>Take account of the physical and environmental constraints on development of land, including flood risk;</p> <p>Include policies relating to PPW11 (2021) 'Water and Flood Risk objectives regarding the effects of development on water supply and wastewater management;</p> <p>Consider the effects of development on water supply and wastewater management, development plans and water and development management and water; and,</p>	<p>resources and the water environment.</p>	

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		<p>When preparing LDPs, LPAs should consult with adjacent authorities and NRW and ensure that, as well as not being at risk itself, development does not increase the risk of flooding elsewhere;</p>		
Air	<p>PPW 11<sup>th</sup> Edition (2021), Future Wales 2040.</p>	<p>These documents require the preparation of LDPs to consider the effects of development on air quality and recognise that air quality impacts from development proposals must be assessed, including by:</p>	<p>Any RLDP resulting from this LDP should provide policies, proposals, advice and guidance relating to air quality.</p>	<p>The ISA Framework should include objectives relating to air quality.</p>

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		<p>Taking account of the 'Agent of Change' principle in the consideration of adverse impacts upon human health caused by air and soundscape quality affected by proposed developments.</p>		
Climatic Factors	<p>PPW 11<sup>th</sup> Edition (2021), Future Wales 2040: The National Plan (2021), WG 'Prosperity for All: A Low Carbon Wales' (2019); Building Better Places (2020).</p>	<p>These documents require the preparation of LDPs to:</p> <p>Align with the need to meet Wales's international commitments to address climate change targets.</p> <p>Align with Wales's targets for the generation of renewable energy, namely:</p>	<p>Any RLDP resulting from this LDP needs to respond to the climate emergency and should provide policies, proposals, advice and guidance relating to climate change mitigation and adaptation, including</p>	<p>The ISA Framework should include objectives relating to climate change mitigation and adaptation.</p>

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		<ul style="list-style-type: none"> <li>○ For 70% of consumed electricity to be generated from renewable energy by 2030;</li> <li>○ For one gigawatt of renewable energy capacity to be locally owned by 2030; and,</li> <li>○ For new renewable energy projects to have at least an element of local ownership from 2020.</li> </ul> <p>Identify opportunities and plan positively for the implementation of District</p>	<p>the need to support developments which will contribute towards meeting international and national climate change targets such as the renewable energy targets set out in Future Wales.</p>	

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		<p>Heat Networks within Priority Areas for District Heat Networks as identified in Future Wales;</p> <p>Align with the WG's presumption in favour of large-scale wind-energy development (including repowering) within the Pre-Assessed Areas for Wind Energy as identified in Future Wales;</p> <p>Ensure that renewable and low carbon energy proposals are in alignment with the criteria set out in Policy 17 and 18 of Future Wales;</p>		

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		<p>Ensure that tackling the causes and consequences of climate change is taken into account in locating new development;</p> <p>Consider the increased risk of physical and environmental constraints as a result of climate change;</p> <p>Policies 16-18 of Future Wales note the priority areas for the development of new renewable energy (wind and solar farms and district heating networks) sites;</p> <p>Commit to contributing towards a reduction in carbon</p>		

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		<p>emitting transport modes and mitigating poor air quality;</p> <p>Support the introduction of Ultra Low Emission Vehicles through the provision of electric vehicle charging infrastructure;</p> <p>Direct development to settlements that are resilient to the effects of climate change, by avoiding areas where environmental consequences and impacts cannot be sustainably managed. Where development takes place in areas of known risks, LDP</p>		

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		<p>policies must ensure that the development is designed for resilience over its whole lifetime; and,</p> <p>Consider the effects of development on the adoption of renewable and low carbon energy.</p>		
Material Assets	<p>PPW 11<sup>th</sup> Edition (2021) Future Wales 2040, WG (2007), TAN 18: Transport, WG (2002) TAN 19: Telecommunications, WG (2014) TAN 21: Waste, WG (2009) Minerals Technical Advice Note (MTAN) Wales 2: Coal, WG (2004) MTAN</p>	<p>These documents require the preparation of LDPs to:</p> <p>Be consistent and integrated with the strategies and policies contained in Local Transport Plans and other relevant strategies. Any LTP proposal that directly involves</p>	<p>Any RLDP resulting from this LDP should provide policies, proposals, advice and guidance relating to infrastructure development, waste management and the</p>	<p>The ISA Framework should include objectives relating to infrastructure development, waste management and the sustainable use of natural resources.</p>

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	<p>Wales 1: Aggregates WG (2004).</p>	<p>the development or use of land, or has land use implications, should appear as a policy or proposal in the development plan;</p> <p>Ensure that transport centred projects undergo an assessment in accordance with the Welsh Transport Appraisal Guidance (WeITAG);</p> <p>LDPs must support PPW (2021) objectives (promoting active travel, supporting public transport, managing traffic and parking and planning for</p>	<p>sustainable use of natural resources.</p>	

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		<p>roads, railways, airports, ports and inland waterways);</p> <p>Take into account the land use implications of the Welsh National Marine Plan (WNMP) (2019);</p> <p>Set out the land use/transportation strategy, addressing accessibility and the provision of strategic and integrated transport facilities, including roads, railways and interchanges;</p> <p>Locate major generators of travel demand within existing urban areas, or in other locations that can be well</p>		

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		<p>served by walking, cycling and public transport;</p> <p>Ensure that development sites which are highly accessible to non-car modes are used for travel intensive uses, reallocating their use if necessary;</p> <p>Locate major generators of travel demand within existing urban areas, or in other locations that can be well served by walking, cycling and public transport;</p> <p>In rural areas, designate local service centres, or clusters of settlements where a</p>		

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		<p>sustainable functional linkage can be demonstrated, as the preferred locations for new development;</p> <p>Include specific measures to promote active travel in accordance with the Active Travel (Wales) Act 2013;</p> <p>Set out policies to promote the use of public transport including new and improved interchange facilities and, where appropriate, park and ride schemes;</p> <p>Include appropriate traffic management policies; • identify the primary road</p>		

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		<p>network, including trunk roads, and separately identify the core network;</p> <p>Identify proposals for new roads and major improvements to the primary route network and the broad policy on priorities for minor improvements;</p> <p>Include policies and proposals relating to the development of transport infrastructure other than roads;</p> <p>Identify, and where appropriate protect, routes</p>		

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		<p>required for the sustainable movement of freight;</p> <p>Protect disused transport infrastructure, including railways, rail sidings, ports, harbours and inland waterways from development that would compromise their future transport use, where re-use is a possibility;</p> <p>Minimise the adverse impacts of transport infrastructure projects on the natural, historic and built environment and on local communities;</p> <p>LDPs should maximise the use of existing infrastructure</p>		

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		<p>and should consider how the provision of different types of infrastructure can be co-ordinated; and,</p> <p>LDPs should identify suitable locations for sustainable waste management as well as criteria for how applications for waste management development will be determined, recognising that the most appropriate locations will be those with the best potential to contribute to a broad infrastructure framework and those with the least adverse impact on the</p>		

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		<p>local population. LDPs should set out policies and proposals for the location of telecommunications equipment, allocating sites for major developments and including criteria-based policies to guide telecommunications developments where sites other than those identified in the plan may be proposed.</p>		
Cultural Heritage	<p>PPW 11<sup>th</sup> Edition (20218), Future Wales 2040, WG (2016) TAN12: Design, WG (1997) TAN20: Planning and the Welsh Language, WG</p>	<p>These documents require the preparation of LDPs to: Adhere to the Welsh Language (Wales) Measure (2011) to support the</p>	<p>Any RLDP resulting from this LDP should provide policies, proposals, advice and guidance relating to the</p>	<p>The ISA Framework should include objectives relating to the protection and enhancement of the</p>

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	(2017) TAN24: The Historic Environment.	<p>preservation of the Welsh language;</p> <p>Provide a statement about how the needs and interests of the Welsh language have been taken into account;</p> <p>If necessary, language impact assessments may be carried out in respect of large developments not allocated in the LDP which are proposed in areas of particular sensitivity or importance for the language. Any such areas should be clearly defined in the development plan;</p>	<p>protection and enhancement of the historic environment and the promotion of the Welsh language.</p>	<p>historic environment and the promotion of the Welsh language.</p>

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		<p>Emphasis on protecting and supporting the Welsh language in policy making and in its contribution towards achieving the Thriving Welsh language well-being goal and the wider WG target of a million welsh language speakers by 2050;</p> <p>Provide policies relating to the protection and preservation of world heritage sites, archaeological remains, listed buildings and conservation areas, local historic assets and historic parks and gardens;</p>		

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		<p>Identify locally specific policies in relation to the historic environment and cover those historic assets deemed to be important considerations from a local planning perspective;</p> <p>Consider the risk archaeological and historic sites by housing developments; and,</p> <p>Policies must also not be introduced which encourages discrimination between individuals based on their linguistic ability or seek to control housing occupancy on linguistic grounds.</p>		

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Landscape	PPW 11 <sup>th</sup> Edition (2021), TAN7 Outdoor Advertisement Control, Future Wales 2040	<p>These documents require the preparation of LDPs to:</p> <p>Take into account designated historic landscapes in Wales and where it is appropriate, develop locally specific policies which will contribute to their conservation;</p> <p>Consider the physical risks to landscape as a result of housing developments;</p> <p>Support the WG's strategic framework for the enhancement of biodiversity and the resilience of ecosystems;</p>	Any RLDP resulting from this LDP should provide policies, proposals, advice and guidance relating to the protection and enhancement of designated landscapes, landscape character, landscape features and visual amenity.	The ISA Framework should include objectives relating to the protection and enhancement of designated landscapes, landscape character, landscape features and visual amenity.

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		<p>Include areas which could be protected as ecological networks for their potential importance for adaptation to climate change, habitat restoration or creation, or which provide key ecosystems services in development planning policy;</p> <p>Support opportunities where strategic green infrastructure could be maximised as part of development proposals, requiring the use of nature-based solutions as a key mechanism for securing sustainable growth, ecological</p>		

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		<p>connectivity, social equality and public well-being; and,</p> <p>Cumulative action towards the enhancement of biodiversity and the resilience of ecosystems should be demonstrated as part of development proposals through innovative, nature-based approaches to site planning.</p>		
Interrelated Effects	PPW 11 <sup>th</sup> Edition (2021), Future Wales 2040, TAN3: Simplified Planning Zones (WG, 1996).	<p>These documents require the preparation of LDPs to:</p> <p>Promote sustainable patterns of development, identifying previously developed land and</p>	Any RLDP resulting from this LDP should provide policies, proposals, advice and guidance to support the	The ISA Framework should provide a suite of linked objectives to support the delivery of

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		<p>buildings, and indicating locations for higher density development at hubs and interchanges and close to route corridors where accessibility on foot and by bicycle and public transport is good;</p> <p>Maintain and improve the vitality, attractiveness and viability of town, district, local and village centres;</p> <p>Development for tourism, sport and leisure uses should, where appropriate, be located on previously developed land;</p>	<p>delivery of sustainable development.</p>	<p>sustainable development.</p>

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		<p>Encourage higher density and mixed-use development near public transport nodes, or near corridors well served by public transport;</p> <p>Foster development approaches that recognise the mutual dependence between town and country, thus improving linkages between urban areas and their rural surroundings;</p> <p>Locate development so that it can be well serviced by existing infrastructure (including for energy supply,</p>		

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		<p>waste management and water;</p> <p>Ensure that development encourages opportunities for commercial and residential uses to derive environmental benefit from co-location;</p> <p>Locate development in settlements that are resilient to the effects of climate change, by avoiding areas where environmental consequences and impacts cannot be sustainably managed.</p> <p>Where development takes place in areas of known risks,</p>		

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		<p>ensure that the development is designed for resilience over its whole lifetime;</p> <p>Contribute to the wider efforts by the planning system to respond to the behavioural changes as a result of the Covid-19 pandemic and contribute to a sustainable recovery shaping places around a vision for healthy and resilient places; and,</p> <p>Include strategic policies on the location of potentially polluting developments and should set out criteria by which applications for such</p>		

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		<p>developments will be determined, but they should not exclude provision for such projects or prohibit all applications to set them up.</p> <p>With reference to the protection of Green Belts and Green Wedges; LDPs should:</p> <p>Provide opportunities for access to the open countryside;</p> <p>Provide opportunities for outdoor sport and outdoor recreation;</p> <p>Maintain landscape/wildlife interest;</p>		

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		<p>Retain land for agriculture, forestry, and related purposes;</p> <p>Improve derelict land; and,</p> <p>Provide carbon sinks and help to mitigate the effects of urban heat islands.</p> <p>PPW (2021) also promotes the protection of agricultural land and the re-use of brownfield land alongside further sustainability guidelines. LDPs should identify opportunities to ensure higher sustainable building standards are adopted, ensure that proposed developments are</p>		

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		<p>evidence based and viable and encourage applications which reflect key principles of climate responsive developments.</p> <p>The preparation of LDPs must ensure that:</p> <p>Their housing trajectory is used as the basis for monitoring the delivery of their housing requirement and will form part of the basis for monitoring the delivery of LDP housing requirements as part of LDP AMRs and for subsequent plan review. The monitoring of housing delivery</p>		

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		<p>for AMRs must be undertaken by planning authorities in accordance with the guidance set out in the Development Plans Manual. Under delivery against the trajectory can itself be a reason to review a development plan;</p> <p>The availability of previously developed sites and empty or underused buildings and their suitability for housing use;</p> <p>The location of potential development sites and their accessibility to jobs, shops and services by modes other than the car, and the potential</p>		

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		<p>for improving such accessibility;</p> <p>The capacity of existing and potential infrastructure, including public transport, water and sewerage, other utilities and social infrastructure (such as schools and hospitals), to absorb further development, and the cost of adding further infrastructure;</p> <p>The scope to build sustainable communities to support new physical and social infrastructure, including consideration of the effect on</p>		

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		<p>the Welsh language, and to provide sufficient demand to sustain appropriate local services and facilities;</p> <p>The compatibility of housing with neighbouring established land uses which might be adversely affected by encroaching residential development;</p> <p>Proposals for new settlements should be promoted through and fully justified in the LDP;</p> <p>LDPs must include an authority wide target for affordable housing based in the LHMA and identify the</p>		

SEA Topic	Relevant Plans, Programmes and Strategies	Overview of Purpose and Key Requirements	Implications for NPT LDP Review	Implications for ISA
		<p>expected contributions that policy approaches identified in the LDP will make to meeting this target;</p> <p>LDPs should also include site thresholds or a combination of thresholds and site-specific targets including the correct proportion of affordable housing;</p> <p>LDPs must be supported by an assessment of the accommodation needs at Gypsy/traveller sites;</p>		

SEA Topic	Relevant Plans, Programmes and Strategies	Overview of Purpose and Key Requirements	Implications for NPT LDP Review	Implications for ISA
		<p>Quantify the housing requirement (both market and affordable housing);</p> <p>Set an affordable housing target;</p> <p>Set out a settlement strategy;</p> <p>Adopt the new sequential search methodology for identifying housing sites;</p> <p>Include clear policy criteria against which applications for development of unallocated sites will be considered;</p> <p>Specify the circumstances in which previously developed sites would be deemed to</p>		

SEA Topic	Relevant Plans, Programmes and Strategies	Overview of Purpose and Key Requirements	Implications for NPT LDP Review	Implications for ISA
		<p>perform so poorly that their use would not be favoured before that of a (particular) greenfield site;</p> <p>Set targets on land provision for the employment uses (Classes B1-B8), showing net change in land/floorspace for offices and industry/warehousing separately, and protect these sites from inappropriate development;</p> <p>Include clear development management policies to guide the determination of applications, including</p>		

SEA Topic	Relevant Plans, Programmes and Strategies	Overview of Purpose and Key Requirements	Implications for NPT LDP Review	Implications for ISA
		<p>guidance on design, access, density, off-street parking and open space provision for particular areas as appropriate;</p> <p>Specify mechanisms to be used to monitor the take up of housing land;</p> <p>Include policies for affordable housing in areas where need has been identified, including any areas where exception sites will be considered; and,</p> <p>Include policies to indicate where developer contributions will be expected toward infrastructure, community</p>		

<b>SEA Topic</b>	<b>Relevant Plans, Programmes and Strategies</b>	<b>Overview of Purpose and Key Requirements</b>	<b>Implications for NPT LDP Review</b>	<b>Implications for ISA</b>
		facilities and affordable housing.		

## Appendix C: Candidate Sites Assessment Scoring Criteria

**Table C.1: General SA Site Assessment Scoring Key**

Effect Definition	Symbol
Major Positive (Significant Beneficial)	++
Minor Positive	+
Neutral	0
Minor Negative	-
Major Negative (Significant Adverse)	--

**Table C.2: od Risk Assessment Scoring Keys- TAN15 Compliant**

Effect Definition	Symbol
Within Zone 1/ Compliant with TAN15	++
Within Defended Zone (Highly Vulnerable/Less Vulnerable Dev)	?
Within Zone 2 (Highly Vulnerable/Less Vulnerable Dev)	??
Within Zone 3 (Less Vulnerable Development Only)	-
Within Zone 3 (Highly Vulnerable Development Only)	--

Highly Vulnerable Development	Symbol
Within Zone 1	++
Within Defended Zone	?
Within Zone 2	??
Within Zone 3	--

Less Vulnerable Development	Symbol
Within Zone 1	++
Within Defended Zone	?
Within Zone 2	??
Within Zone 3	-

Water Compatible	Symbol
Within Zone 1	++
Within Defended Zone	++
Within Zone 2	++
Within Zone 3	++

## Table 2: Full SA Site Assessment Scoring Criteria<sup>1</sup>

### SA Objective N/A

#### Criteria: Common Land

##### *Sustainability implications:*

The Commons Act 2006 restricts the use of Common Land and requires applications for the release of Common Land exceeding 200m to be accompanied by proposals for replacement land (i.e., land cannot be released for development without this requirement being fulfilled). The loss of Common Land could result in local amenity and environmental impacts, which may or may not be adequately offset by the defined proposals for replacement Common Land. This must be taken account of in evaluating the overall sustainability and thus suitability of candidate site allocations. Any instances of sites promoted by the LPA which constitute common land will not be excluded solely on this basis. Any sustainability impacts would also depend on the extent of Common Land lost and the scale of development proposed.

#### **Table C.3: Common Land**

Description	Symbol
Site on common land	--
Site not on common land	0

<sup>1</sup> 'Showstopper' criteria highlighted in bold.

## **SA Objective 1 Health and Wellbeing Criteria**

### **Criteria 1(a): Proximity to Existing Active Travel Routes**

#### *Sustainability implications:*

Whilst lack of proximity to active travel routes is not a fundamental constraint, this must be taken account of in evaluating the overall sustainability and thus suitability of candidate site allocations. Any sustainability impacts would also depend on the scale of development proposed. These will be considered in the later stages of the process.

**Table C.4: Proximity to Existing Active Travel Routes**

<b>Description</b>	<b>Symbol</b>
Within 400m of existing route	+++
Within 800m of existing route	+
800-1200m from existing route	-
Beyond 1200m from existing route	--

Criteria 1(b): Proximity to Health Facilities

*Sustainability implications:*

Whilst lack of proximity to healthcare facilities is not a fundamental constraint, this must be taken account of in evaluating the overall sustainability and thus suitability of candidate site allocations. Any sustainability impacts would also depend on the scale of development proposed. These will be considered in the later stages of the process

**Table C.5: Proximity to Health Facilities**

Description	Symbol
Within 400m of a healthcare facility	++-
Within 800m of a healthcare facility	+
800-1200m of a healthcare facility	-
Beyond 1200m from a healthcare facility	--

Criteria 1(c): Proximity of New Health Facilities and/or Active Travel Routes

*Sustainability implications:*

Depending on the scale of development, health needs should be met through onsite provision and/or contributions as appropriate, including provision of active travel opportunities which directly contribute to positive health outcomes. The absence of this would indicate the physical and mental health needs of residents/users may not be fully met.

**Table C.6: Proximity of New Health Facilities and/or Active Travel Routes**

Description	Symbol
Proposal to provide healthcare facility within site or develop section of identified active travel route within the site.	++-
Proposal to contribute to off-site health facility or active travel improvements	+
No new health facilities or active travel routes / contribution being proposed at this stage	0-

## Table 2(b): SA

### SA Objective 2: Equality and Social Inclusion

#### Criteria 2(a): Proximity to Community Facilities/ Public Services

##### *Sustainability implications:*

Whilst lack of proximity to community facilities is not a fundamental constraint, this must be taken account of in evaluating the overall sustainability and thus suitability of candidate site allocations. Any sustainability impacts would also depend on the scale of development proposed. These will be considered in the later stages of the process.

#### **Table C.7: Proximity to Community Facilities/ Public Services**

Description	Symbol
Within 400m of a community facility (community hall, library, council leisure facility or council service centre)	+++
Within 800m of a community facility	+
800 - 1200m from a community facility	-
Beyond 1200m from a community facility	--

Criteria 2(c): Provision of New Community Facilities/ Services

*Sustainability implications:*

Depending on the scale of development, social needs should be met through onsite provision and/or contributions as appropriate. The absence of this would indicate the social and wellbeing needs of residents/users may not be fully met, resulting in potential lack of community cohesion and social isolation (for vulnerable groups in particular).

**Table C.8: Provision of New Community Facilities/ Services**

Description	Symbol
Proposal to provide community facility within site	++-
Proposal to contribute to off-site community facility improvements	+
No new community facilities proposed at this stage	0-

### **SA Objective 3: Transport and Communications**

#### **Criteria 3(a): Proximity to Public Transport Network (bus stops and train stations)**

*Sustainability implications:*

Lack of proximity to public transport would lock in car dependency for residents/users (e.g. employees), resulting in traffic and Green HouseGas (GHG) impacts, and increase isolation for those without car ownership. This is an important consideration in determining the overall sustainability and thus suitability of candidate site allocations. Any sustainability impacts would also depend on the scale of development proposed. These will be considered in the later stages of the process.

**Table C.9: Proximity to Public Transport Network (bus stops and train stations)**

Description	Symbol
Within 400m of a bus stop or train station	++-
Within 800m of a bus stop or train station	+
800 - 1200m from a bus stop or train station	-
Beyond 1200m from a bus stop or train station	--

Criteria 3(b): Proximity to Strategic Road Network (motorways and trunk roads)

*Sustainability implications:*

Whilst lack of proximity to the strategic road network is not a fundamental constraint, it must be considered as part of determining site accessibility (all modes). This must be taken account of in evaluating the overall sustainability and thus suitability of candidate site allocations. Any sustainability impacts would also depend on the scale of development proposed. These will be considered in the later stages of the process.

**Table C.10: Proximity to Strategic Road Network (motorways and trunk roads)**

Description	Symbol
Within 500m of strategic road network	+++
Within 500m - 1km of strategic road network	+
1km - 2km from strategic road network	-
Beyond 2km from strategic road network	--

Criteria 3(c): Proximity to Existing Active Travel Network

*Sustainability implications:*

Whilst lack of proximity to active travel routes is not a fundamental constraint, this must be taken account of in evaluating the overall sustainability and thus suitability of candidate site allocations. Any sustainability impacts would also depend on the scale of development proposed. These will be considered in the later stages of the process.

**Table C.11: Proximity to Existing Active Travel Network**

Description	Symbol
Within 400m of existing route	++-
Within 800m of existing route	+
800 - 1200m from existing route	-
Beyond 1200m from existing route	--

Criteria 3(d): Proximity to Congestion Pinch Points

*Sustainability implications:*

Proximity to congestion hotspots could further increase traffic delays, resulting in adverse air quality, amenity and climate impacts. This must be taken account of in evaluating the overall sustainability and thus suitability of candidate site allocations. Any sustainability impacts would also depend on the scale of development proposed. These will be considered in the later stages of the process.

**Table C.12: Proximity to Congestion Pinch Points**

Description	Symbol
Beyond 2km from pinch point	+++
1km - 2km from pinch point	+
Within 500m - 1km of pinch point	-
Within 500m of pinch point	--

Criteria 3(e): Availability & Capacity of Transport & Utilities Infrastructure (Water and Sewage)

*Sustainability implications:*

The provision or absence of adequate transport infrastructure to accommodate development could impact on the capacity and functioning of the surrounding transport network (all modes), leading to congestion/delays, adverse air quality impacts and/or inhibiting sustainable modal shift. This must be taken account of in evaluating the overall sustainability and thus suitability of candidate site allocations. Any sustainability impacts would also depend on the scale of development proposed. This must be taken account of in evaluating the overall sustainability and thus suitability of candidate site allocations. Any sustainability impacts would also depend on the scale of development proposed. These will be considered in the later stages of the process.

**Table C.13: Availability & Capacity of Transport & Utilities Infrastructure (Water and Sewage)**

Description	Symbol
Existing Connection or Infrastructure established	++-
Upgraded / new infrastructure required to accommodate development	-
No information available	0

Criteria 3(f): Drainage Management and Site Capacity

*Sustainability implications:*

Strategic infrastructure may be needed to address non-localised (e.g. cumulative) infrastructure impacts. The provision/funding or absence of strategic infrastructure could therefore influence the delivery and phasing of development sites to meet identified needs and resulting environmental/amenity impacts. This must be taken account of in evaluating the overall sustainability and thus suitability of candidate site allocations. Any sustainability impacts would also depend on the scale of development proposed. These will be considered in the later stages of the process.

**Table C.14: Drainage Management and Site Capacity**

Description	Symbol
Welsh Water confirms no issue with site capacity	++-
Site promoter outlines measures to address drainage at site.	+
Welsh Water confirms limited capacity.	-
Welsh Water confirms no Capacity	--
No information available	0

Criteria 3(g): Provision of New/ Upgraded Transport or Communications Infrastructure

*Sustainability implications:*

Strategic infrastructure may be needed to address non-localised (e.g. cumulative) infrastructure impacts. The provision/funding or absence of strategic infrastructure could therefore influence the delivery and phasing of development sites to meet identified needs and resulting environmental/amenity impacts. This must be taken account of in evaluating the overall sustainability and thus suitability of candidate site allocations. Any sustainability impacts would also depend on the scale of development proposed. These will be considered in the later stages of the process.

**Table C.15: Provision of New/ Upgraded Transport or Communications Infrastructure**

Description	Symbol
Proposal to provide non-local transport or utilities infrastructure within site	++-
Proposal to contribute to off-site transport or utilities infrastructure improvements	+
No new non-local transport or utilities infrastructure proposed at this stage	0

**SA Objective 4: Employment Capacity**

Criteria 4(a): Employment Capacity

*Sustainability implications:*

The loss of employment land<sup>2</sup> (where retention recommended by future version of the NPT Employment Land Review could undermine the RLDP employment land strategy.

**Table C.16: Employment Capacity**

Description	Symbol
5ha or more land for employment use	++-
Up to 5ha land for employment use	+
No employment use proposed/ no employment land	0
Removal of existing employment land for other uses	-
Removal of existing employment land for other uses where NPTELRL recommends retention.	--

<sup>2</sup> Definition of employment land to be specified in emerging NPT Employment Land Review.

Criteria 4(b): Mixed Use Suitability

*Sustainability implications:*

Mixed use development has the potential to deliver high densities and more sustainable outcomes. The absence of mixed use development is not a fundamental constraint but must be taken account of in evaluating the overall sustainability and thus suitability of candidate site allocations. Any sustainability impacts would also depend on the scale of development proposed. These will be considered in the later stages of the process.

**Table C.17: Mixed Use Suitability**

Description	Symbol
Proposed for mixed use development	+++
Site has potential to accommodate mixed use development	+
Site not likely to accommodate mixed use development	-

Criteria 4(c): Proximity to Key Employment Locations

*Sustainability implications:*

Whilst lack of proximity to employment opportunities (existing main employment areas) is not a fundamental constraint, this must be taken account of in evaluating the overall sustainability and thus suitability of candidate site allocations. Any sustainability impacts would also depend on the scale of development proposed. These will be considered in the later stages of the process.

**Table C.18: Proximity to Key Employment Locations**

Description	Symbol
Within 500m of key employment location	++-
Within 500m - 1km of key employment location	+
1km - 2km from key employment location	-
Beyond 2km from key employment location	--

Criteria 4(d): Proximity to Primary Education Infrastructure

*Sustainability implications:*

Whilst lack of proximity to primary education infrastructure is not a fundamental constraint, this must be taken account of in evaluating the overall sustainability and thus suitability of candidate site allocations. Any sustainability impacts would also depend on the scale of development proposed. These will be considered in the later stages of the process.

**Table C.19: Proximity to Primary Education Infrastructure**

Description	Symbol
Within 400m of primary school	++-
Within 800m of primary school	+
800 - 1200m from primary school	-
Beyond 1200m from primary school	--

Criteria 4(e): Proximity to Secondary Education Infrastructure

*Sustainability implications:*

Whilst lack of proximity to secondary education infrastructure is not a fundamental constraint, this must be taken account of in evaluating the overall sustainability and thus suitability of candidate site allocations. Any sustainability impacts would also depend on the scale of development proposed. These will be considered in the later stages of the process.

**Table C.20: Proximity to Secondary Education Infrastructure**

Description	Symbol
Within 400m of secondary school	++-
Within 800m of secondary school	+
800 - 1200m from secondary school	-
Beyond 1200m from secondary school	--

Criteria 4(f): Education Infrastructure Capacity

*Sustainability implications:*

Inadequate education infrastructure capacity to accommodate development could place NPTC in breach of statutory education duties and would not be compatible with sustainable development. Adequate mitigation would be required.

**Table C.21: Education Infrastructure Capacity**

Description	Symbol
NPTC Education Department confirms no capacity issue affecting site delivery	++-
Proposal includes measures/facilities to address education capacity constraints	+
No information available regarding education capacity constraints affecting site delivery	-
Beyond 1200m from secondary school	--

Criteria 4(g): Provision of New Education Infrastructure

*Sustainability implications:*

Depending on the scale of development, net additional education needs should be met through onsite provision and/ or contributions as appropriate. The absence of this would indicate that the education needs of residents may not be fully met and could place NPTC in breach of statutory education duties. This would not be compatible with sustainable development and adequate mitigation would be required.

**Table C.22: Provision of New Education Infrastructure**

Description	Symbol
Proposal to provide education infrastructure within site	+++
Proposal to contribute to off-site education infrastructure improvements	+
No new education infrastructure proposed at this stage	0

Criteria 4(h): Suitability of Industrial/ Economic Use

*Sustainability implications:*

Overprovision of employment land could dilute effectiveness of RLDP employment land and wider spatial strategies (i.e. directing employment generating development to the most appropriate and sustainable locations, and growing key economic sectors). Conversely, local underprovision or a failure to meet a specific locational need could restrict economic growth, restrict sectoral growth and limit employment opportunities. This must be taken account of in evaluating the overall sustainability and thus suitability of candidate site allocations. Any sustainability impacts would also depend on the scale of development proposed. These will be considered in the later stages of the process.

**Table C.23: Suitability of Industrial/ Economic Use**

Description	Symbol
NPT ELR indicates site is preferred for industrial/ economic use	++-
NPT ELR indicates site is suitable for industrial/ economic use butwith marketability constraints	+
NPT ELR indicates site has some physical constraints affecting industrial/ economic use OR not preferred due to adequate (moresuitable) supply of employment land already identified	-
NPT ELR indicates site is not suitable for industrial/ economic use	--

Criteria 4(i): Neighbouring Uses & Potential Agglomeration Effects

*Sustainability implications:*

Integration or conflicts with neighbouring (and wider surrounding) land uses could result in amenity, social or economic impacts. Co-location of employment/industrial uses could also generate agglomeration effects and catalyse economic growth. This must be taken account of in evaluating the overall sustainability and thus suitability of candidate site allocations. Any sustainability impacts would also depend on the scale of development proposed. These will be considered in the later stages of the process.

**Table C.24: Neighbouring Uses & Potential Agglomeration Effects**

Description	Symbol
Proposed use would integrate with neighbouring uses	+++
No land use integration or conflicts likely	0
Proposed use likely to conflict with neighbouring uses	--

Criteria 4(i): Proximity to Strategic Road and Rail Network

*Sustainability implications:*

Proximity to strategic road network could affect the efficiency and environmental impacts of freight movements (materials delivery and product distribution) and well workforce. Whilst lack of proximity to the strategic road network is not a fundamental constraint, it must be considered as part of determining site accessibility (all modes). This must be taken account of in evaluating the overall sustainability and thus suitability of candidate site allocations. Any sustainability impacts would also depend on the scale of development proposed. These will be considered in the later stages of the process.

**Table C.25: Proximity to Strategic Road and Rail Network**

Description	Symbol
Within 500m of strategic road or rail network (inc. passenger rail services)	++-
Within 500m - 1km of strategic road or rail network (inc. passenger rail services)	+
1km - 2km from strategic road or rail network (inc. passenger rail services)	-
Beyond 2km from strategic road or rail network (inc. passenger rail services)	--

## **SA Objective 5: Housing**

### **Criteria 5(a): Housing Capacity of the Site**

#### *Sustainability implications:*

The provision of net additional housing would contribute to meeting local and authority wide housing needs, as well as supporting population growth and delivery of the RLDP spatial strategy. Conversely, the loss of existing housing land could undermine the RLDP spatial strategy and exacerbate housing pressures (availability, affordability, etc.). This must be taken account of in evaluating the overall sustainability and thus suitability of candidate site allocations. Any sustainability impacts would also depend on the scale of development proposed. These will be considered in the later stages of the process.

**Table C.26: Housing Capacity of the Site**

Description	Symbol
5ha or more land for housing	+++
Up to 5ha land for housing	+
No residential use proposed / no residential land	0
Removal of existing housing land up to 10ha for other uses	-

Criteria 5(b): Deliverability of Affordable Housing

*Sustainability implications:*

The provision of affordable housing (at or above policy expectations) would contribute to meeting local and authority wide affordable housing needs, deliver mixed tenure developments with diverse communities, enable population growth and support delivery of the RLDP spatial strategy. Conversely, inadequate provision of affordable housing would exacerbate housing affordability pressures, limit household growth and undermine delivery of the RLDP spatial strategy. This must be taken account of in evaluating the overall sustainability and thus suitability of candidate site allocations. Any sustainability impacts would also depend on the scale of development proposed. These will be considered in the later stages of the process

**Table C.27: Deliverability of Affordable Housing**

Description	Symbol
Direct affordable housing proposal (100% AH)	++-
Indirect affordable housing delivery through market housing proposal	+
Site promoter contends non-viability of affordable housing within market housing	0

Criteria 5(c): Mixed Use Suitability

*Sustainability implications:*

Mixed use development has the potential to deliver high densities and more sustainable outcomes. The absence of mixed-use development is not a fundamental constraint but must be taken account of in evaluating the overall sustainability and thus suitability of candidate site allocations. Any sustainability impacts would also depend on the scale of development proposed. These will be considered in the later stages of the process.

**Table C.28: Mixed Use Suitability**

Description	Symbol
Proposed for mixed use development	+++
Site has potential to accommodate mixed use development	+
Site not likely to accommodate mixed use development	-

Criteria 5(d): Neighbouring Uses

*Sustainability implications:*

Integration or conflicts with neighbouring (and wider surrounding) land uses could result in amenity, social or economic impacts. This must be taken account of in evaluating the overall sustainability and thus suitability of candidate site allocations. Any sustainability impacts would also depend on the scale of development proposed. These will be considered in the later stages of the process.

**Table C.29: Neighbouring Uses**

Description	Symbol
Proposed use would integrate with neighbouring uses	+++
Site has potential to accommodate mixed use development	0
Proposed use likely to conflict with neighbouring uses	-

Criteria 5(e): Proximity to Control of Major Accident Hazards (COMAH) Sites

*Sustainability implications:*

Development in close proximity to COMAH installations (i.e. within Health and Safety Executive (HSE) notification zones) would introduce additional HSE risks. The acceptability of such risks requires to be considered when determining the feasibility of development, taking account of site characteristics and the type of development/land use proposed. This must be taken account of in evaluating the overall sustainability and thus suitability of candidate site allocations. Any sustainability impacts would also depend on the scale of development proposed. These will be considered in the later stages of the process

**Table C.30: Proximity to Control of Major Accident Hazards (COMAH) Sites**

Description	Symbol
Outside COMAH / HSE Notification Zone	0
Within 500m of COMAH / HSE Notification Zone	-
Within COMAH / HSE Notification Zone	--

Criteria 5(f): Proximity to Sites Designated in National Site Network<sup>3</sup> (vulnerable to recreational pressures)

*Sustainability implications:*

Population growth arising from housing development could result in increased recreational pressure (and other types of effects), resulting in Likely Significant Effects on the qualifying interests of Designated sites in the National Site Network (NSN). This could generate adverse effects on the achievement of Conservation Objectives and/or integrity of NSN Sites. To comply with the HRA Regulations, any Likely Significant Effects must be assessed (in the absence of mitigation) and development of the site must not have an adverse effect on sites integrity or conservation objectives (taking account of mitigation) which are designated in National Site Network. This is an important consideration in determining the overall sustainability and thus suitability of candidate site allocations. Any sustainability impacts would also depend on the scale of development proposed. These will be considered in the later stages of the process

**Table C.31: Proximity to Sites Designated in National Site Network<sup>3</sup> (vulnerable to recreational pressures)**

Description	Symbol
Beyond 2km from Designated NSN Site	++-
Within 1km - 2km of Designated NSN Site	+
Within 500m - 1km of Designated NSN Site	-
Within 500m of Designated NSN Site	--

<sup>3</sup> Including Special Areas of Conservation (SACs) and Special Protection Areas (SPAs)

## **SA Objective 6: Air Quality**

### **Criteria 6(a): Proximity to Air Quality Management Area (AQMA)**

#### *Sustainability implications:*

Proximity to AQMAs could exacerbate existing poor air quality in localised areas, with adverse health, amenity and environmental consequences. This must be taken account of in evaluating the overall sustainability and thus suitability of candidate site allocations. Any sustainability impacts would also depend on the scale of development proposed. These will be considered in the later stages of the process.

**Table C.32: Proximity to Air Quality Management Area (AQMA)**

Description	Symbol
Beyond 2km from AQMA	++-
Within 1km - 2km of AQMA	+
Within 1km of AQMA	-
Within AQMA	--

Criteria 6(b): Proximity to Congestion Pinch Point

*Sustainability implications:*

Proximity to congestion hotspots could further increase traffic delays, resulting in adverse air quality impacts. This must be taken account of in evaluating the overall sustainability and thus suitability of candidate site allocations. Any sustainability impacts would also depend on the scale of development proposed. These will be considered in the later stages of the process.

**Table C.33: Proximity to Congestion Pinch Point**

Description	Symbol
Beyond 2km from pinch point	++-
1km - 2km from pinch point	+
Within 500m - 1km of pinch point	-
Within 500m of pinch point	--

Criteria 6(c): Potential Operational Emissions

*Sustainability implications:*

All land use activities have the potential to generate operational phase GHG emissions, whether directly from industrial processes (employment sites) or indirectly from energy consumption (domestic, non-domestic or transport related). The emerging NPT RLDP must respond to the climate emergency, including planning to support a low carbon economy and to minimise emissions from development (in pursuit of net zero targets). Consideration of likely operational GHG emissions must therefore be taken into account in evaluating the overall sustainability and thus suitability of candidate site allocations. Any sustainability impacts would also depend on the scale of development proposed. These will be considered in the later stages of the process.

**Table C.34: Potential Operational Emissions**

Description	Symbol
Proposed operational use likely to generate non-domestic GHG emissions	-
No information available regarding potential operational emissions	0

**SA Objective 7: Climate Change**

**Criteria 7(a): Onsite provision of Low/Zero Carbon Energy Generation**

*Sustainability implications:*

National policy (PPW11 & Future Wales 2040) makes clear there is a need for additional renewable energy and low/ zero carbon energy generation capacity in order to support the transition to a low carbon economy and achieve net zero climate targets. The emerging NPT RLDP must respond to the climate emergency, including planning to support a low carbon economy and providing an appropriate policy framework for the installation of low/ zero carbon energy generation and renewable energy developments. Any options for the provision of low/ zero carbon energy generation within candidate sites must therefore be taken into account in evaluating the overall sustainability and thus suitability of candidate site allocations. Any sustainability impacts would also depend on the scale of development proposed. These will be considered in the later stages of the process.

**Table C.35: Onsite provision of Low/Zero Carbon Energy Generation**

Description	Symbol
Candidate site form/ response indicates likely provision of Low/Zero Carbon Energy Generation	++-
No information provided by site promoter	0
Within 1km of AQMA	-
Within AQMA	--

Criteria 7(b): Proximity to Public Transport Network

*Sustainability implications:*

Lack of proximity to public transport would lock in car dependency for residents/ users (e.g. employees), resulting in traffic and GHG impacts. This is an important consideration in determining the overall sustainability and thus suitability of candidate site allocations. Any sustainability impacts would also depend on the scale of development proposed. These will be considered in the later stages of the process.

**Table C.36: Proximity to Public Transport Network**

Description	Symbol
Within 400m of a bus stop or passenger train	+++
Within 800m of a bus stop or passenger train	+
800-1200m from a bus stop or passenger train	-
Beyond 1200m from a bus stop or train station	--

Criteria 7(c): Incorporation of Climate Change Adaptation Measures

*Sustainability implications:*

Development needs to be sited and designed to adapt to/ cope with the effects of climate change. There is also a need for increased resilience within the natural environment to respond to climatic and associated environmental changes. The provision of adaptation measures as part of site allocations would therefore enhance the capacity of built and natural environments to respond to climate change. . Conversely, the absence of such measures within development sites could increase risks to life, property and livelihoods, as well as reducing ecosystem resilience. This must be taken account of in evaluating the overall sustainability and thus suitability of candidate site allocations.

Any sustainability impacts would also depend on the scale of development proposed. These will be considered in the later stages of the process.

**Table C.37: Incorporation of Climate Change Adaptation Measures**

Description	Symbol
Proposal includes Climate Change Adaptation Measures	++-
Proposal doesn't include information regarding potential ClimateChange Adaptation Measures	?-

**SA Objective 8: Biodiversity, Geodiversity and Soil**

**Criteria 8(a): Proximity to National Site Network Sites (SAC/SPA)**

*Sustainability implications:*

Development could generate a range of pressures and environmental effects, resulting in impact pathways and the potential for Likely Significant Effects on the qualifying interests of National Site Network (NSN) Sites. This could generate adverse effects on the achievement of Conservation Objectives and/or integrity of (NSN) Sites. To comply with the HRA Regulations, any Likely Significant Effects must be assessed (in the absence of mitigation) and development of the site must not have an adverse effect on National Site Network Site (NSN) integrity or conservation objectives (taking account of mitigation). The potential for likely significant effects on a NSN Designated Site is a very important consideration in determining the overall sustainability and thus suitability of candidate site allocations. Any sustainability impacts would also depend on the scale of development proposed. These will be considered in the later stages of the process.

**Table C.38: Proximity to National Site Network Sites (SAC/SPA)**

Description	Symbol
Beyond 2km from Designated NSN Site	++-
Within 1km - 2km of Designated NSN Site	
Within 500m - 1km of Designated NSN Site	-
Within 500m of Designated NSN Site	--

Criteria 8(b): Proximity to SSSI

*Sustainability implications:*

Development could generate a range of pressures and environmental effects, resulting in impact pathways and the potential for Likely Significant Effects on the qualifying interests of National Site Network (NSN) Sites. This could generate adverse effects on the achievement of Conservation Objectives and/or integrity of (NSN) Sites. To comply with the HRA Regulations, any Likely Significant Effects must be assessed (in the absence of mitigation) and development of the site must not have an adverse effect on National Site Network Site (NSN) integrity or conservation objectives (taking account of mitigation). The potential for likely significant effects on a NSN Designated Site is a very important consideration in determining the overall sustainability and thus suitability of candidate site allocations. Any sustainability impacts would also depend on the scale of development proposed. These will be considered in the later stages of the process.

**Table C.39: Proximity to SSSI**

Description	Symbol
Beyond 2km from SSSI	+++
Within 1km - 2km of SSSI	
Within 1km of SSSI	-
Within SSSI	--

Criteria 8(c): Proximity to Ancient Woodland

*Sustainability implications:*

In the absence of mitigation (siting, design, construction and operational techniques), development in proximity to Ancient Woodland (or where Ancient Woodland is present within the site) could result in unacceptable habitat loss or deterioration. Development could also generate a range of pressures and environmental effects, resulting in indirect impact pathways and the potential for adverse effects on Ancient Woodland. In accordance with PPW11, loss or deterioration of irreplaceable habitats effects must be avoided unless, in wholly exceptional circumstances, evidence demonstrates that significant and clearly defined public benefits outweigh adverse impacts. Significant harm to biodiversity must also be avoided, including through adoption of the mitigation hierarchy where required. The potential for adverse impacts on Ancient Woodland is an important consideration in determining the overall sustainability and thus suitability of candidate site allocations. Any sustainability impacts would also depend on the scale of development proposed. . These will be considered in the later stages of the process.

**Table C.40: Proximity to Ancient Woodland**

Description	Symbol
Beyond 1km from Ancient Woodland	++-
Within 500m - 1km of Ancient Woodland	
Within 500m of Ancient Woodland	-
Site includes Ancient Woodland	--

Criteria 8(d): Proximity to NNR

*Sustainability implications:*

Development could generate a range of pressures and environmental effects, resulting in impact pathways and the potential for adverse effects on the features and integrity of a NNR. PPW11 sets out a presumption against development resulting in adverse effects on the features for which a site has been designated. In accordance with this, adverse effects must be avoided unless, in exceptional circumstances, evidence demonstrates development benefits outweigh adverse impacts. The potential for adverse impacts on a NNR is an important consideration in determining the overall sustainability and thus suitability of candidate site allocations. Any sustainability impacts would also depend on the scale of development proposed. . These will be considered in the later stages of the process.

**Table C.41: Proximity to NNR**

Description	Symbol
Beyond 2km from NNR	++-
Within 1km - 2km of NNR	
Within 1km of NNR	-
Within NNR	--

Criteria 8(e): Proximity to RIGS<sup>4</sup>

*Sustainability implications:*

PPW11 requires planning authorities to protect the features and qualities for which Geoparks and RIGS have been designated, as well as encouraging the incorporation of geological features within the design of development, particularly where relevant evidence is provided by Green Infrastructure Assessments. Development could generate a range of direct and indirect environmental effects, resulting in impact pathways and the potential for adverse impacts on the features and qualities of a RIGS. The potential for adverse impacts on a RIGS is an important consideration in determining the overall sustainability and thus suitability of candidate site allocations. Any sustainability impacts would also depend on the scale of development proposed. . These will be considered in the later stages of the process.

**Table C.42: Proximity to RIGS**

Description	Symbol
Beyond 1km from RIGS	++-
Within 500m - 1km of RIGS	
Within 500m of RIGS	-
Within RIGS	--

<sup>4</sup> Regionally Important Geodiversity Site (RIGS)

Criteria 8(f): Proximity to LWS/SINC/LNR<sup>5</sup>

*Sustainability implications:*

Development could generate a range of pressures and environmental effects, resulting in impact pathways and the potential for adverse effects on the features and integrity of a LWS. PPW11 sets out a presumption against development resulting in adverse effects on the features for which a site has been designated. In accordance with this, adverse effects must be avoided unless evidence demonstrates development benefits outweigh adverse impacts. The potential for adverse impacts on a LWS is an important consideration in determining the overall sustainability and thus suitability of candidate site allocations. Any sustainability impacts would also depend on the scale of development proposed. These will be considered in the later stages of the process.

**Table C.43: Proximity to LWS/SINC/LNR**

Description	Symbol
Beyond 1km from LWS / SINC/ LNR	++-
Within 500m - 1km of LWS / SINC/ LNR	
Within 500m of LWS / SINC/ LNR	-
Within LWS / SINC/ LNR	--

<sup>5</sup> Local Wildlife Sites/ Sites of Importance for Nature Conservation/Local Nature Reserve

Criteria 8(g): Potential Effects on Designated Sites<sup>6</sup>

*Sustainability implications:*

Development could generate a range of pressures and environmental effects, resulting in impact pathways and the potential for adverse effects on the features and integrity of a designated site. PPW11 sets out a presumption against development resulting in adverse effects on the features for which a site has been designated. In accordance with this, adverse effects must be avoided unless evidence demonstrates development benefits outweigh adverse impacts. The potential for adverse impacts on a designated site is an important consideration in determining the overall sustainability and thus suitability of candidate site allocations. Any sustainability impacts would also depend on the scale of development proposed. . These will be considered in the later stages of the process.

**Table C.44: Potential Effects on Designated Sites**

Description	Symbol
Potential minor adverse ecological effects on designated site	-
Likely significant adverse ecological effects on designated sites -mitigation required	--
No information available regarding potential ecological effects	0

<sup>6</sup> As identified in the Designated Sites Hierarchy in Figure 12, PPW (11<sup>th</sup> Edition); Special Area of Conservation, Special Protection Area, Ramsar Sites UNESCO Biosphere Reserve, Site of Special Scientific Interest, National Nature Reserve, Sites of Importance for Nature Conservation, Local Nature Reserve & Local Wildlife Sites.

Criteria 8(h): Presence of Important Trees, Hedgerows or Tree Protection Orders (TPOs)?

*Sustainability implications:*

PPW11 requires planning authorities to protect trees, hedgerows, groups of trees and areas of woodland where they have ecological value, contribute to the character or amenity of a particular locality, or perform a beneficial and identified green infrastructure function. In the absence of mitigation (siting, design, construction and operational techniques), development in proximity to trees/woodland or hedgerows (or where present within the site) could result in adverse biodiversity impacts including habitat loss or deterioration. Development could also generate a range of pressures and environmental effects, resulting in indirect impact pathways and the potential for adverse effects on woodland. The potential for adverse impacts on trees/woodland and hedgerows is an important consideration in determining the overall sustainability and thus suitability of candidate site allocations. Any sustainability impacts would also depend on the scale of development proposed. . These will be considered in the later stages of the process.

**Table C.45: Presence of Important Trees, Hedgerows or Tree Protection Orders (TPOs)?**

Description	Symbol
Site does not include TPO, Important Trees or Hedgerows	0
Site includes TPO, Important Trees or Hedgerows	--

Criteria 8(i): Presence of Valued Habitats and Species

*Sustainability implications:*

In accordance with statutory requirements, PPW11 requires development not to result in disturbance or harm to Protected Species or its habitat and to ensure the range and population of the species is sustained. Significant harm to biodiversity must also be avoided, including through adoption of the mitigation hierarchy where required. In the absence of mitigation (siting, design, construction and operational techniques), development in proximity to Protected Species' habitats could result in unacceptable disturbance effects or harm. Development could also generate a range of pressures and environmental effects, resulting in indirect impact pathways and the potential for adverse effects on Protected Species. The potential for adverse impacts on Protected Species and associated habitats is an important consideration in determining the overall sustainability and thus suitability of candidate site allocations. Any sustainability impacts would also depend on the scale of development proposed. . These will be considered in the later stages of the process.

**Table C.46: Presence of Valued Habitats and Species**

Description	Symbol
Proposal includes onsite habitat enhancement proposals	++-
Potential minor adverse effects on valued habitats and species	-
Likely significant adverse ecological effects on valued habitats and species	--
No information available regarding potential ecological effects	?

Criteria 8(j): Standardised Ecological Summary (incorporating NRW Scoring & other information)

*Sustainability implications:*

Development could generate a range of pressures and environmental effects, resulting in impact pathways and the potential for adverse effects on the features and integrity of a designated site. PPW11 sets out a presumption against development resulting in adverse effects on the features for which a site has been designated. In accordance with this, adverse effects must be avoided unless evidence demonstrates development benefits outweigh adverse impacts. The potential for adverse impacts on a designated site is an important consideration in determining the overall sustainability and thus suitability of candidate site allocations. Any sustainability impacts would also depend on the scale of development proposed. These will be considered in the later stages of the process.

**Table C.47: Standardised Ecological Summary (incorporating NRW Scoring & other information)**

Description	Symbol
Proximity to ecological designations: no other constraints found	++-
No known ecological constraints	
Proximity to ecological designations: species assumed present	-
No known ecological designations: species assumed present	--

Criteria 8(k): Agricultural Land Classification (ALC)

*Sustainability implications:*

PPW11 requires the best and most versatile agricultural land to be conserved as a finite resource for the future. The loss of such land (including degradation of high-quality soils for agriculture) could result in both reduced agricultural capacity and degraded ecosystem services. PPW11 requires RLDP site selection to afford considerable weight to protecting such land from development, because of its special importance. This means it is necessary for candidate sites involving the loss of ALC 1-3 land to demonstrate an overriding need for development, including taking account of other candidate sites and their environmental sensitivities.

The ALC V2 dataset (Dec 2019) will be used pending any future dataset updates.

**Table C.48: Agricultural Land Classification (ALC)**

Description	Symbol
ALC Class 5	++-
ALC Class 4	
ALC Class 2 or 3	-
ALC Class 1	--
No ALC Classification	

## **SA Objective 9: Water and Flood Risk**

### **Criteria 9(a): Proximity to Flood Risk Zones**

#### *Sustainability implications:*

PPW11 and TAN15 require that development reduce, and must not increase, flood risk arising from river and/or coastal flooding. Highly vulnerable development (HVD) in high-risk areas is not compliant with the requirements of TAN15. Any flooding consequences associated with highly vulnerable development are not considered to be acceptable. Plan allocations must not be made for such development and planning applications not proposed. Further TAN15 policy tests are required to be met for HVD in both the Defended Zone and Zone 2, while Less Vulnerable Development proposals are required to meet further TAN 15 policy tests for the Defended Zone, Zone 2 and Zone 3. Water Compatible Development is compliant with TAN15 in all circumstances. These are a very important considerations which must be taken account of in evaluating the overall sustainability, viability and thus suitability of candidate site allocations. Any sustainability impacts would also depend on the scale of development proposed. The full definitions of Highly Vulnerable, Less Vulnerable and Water Compatible are provided within TAN15.

**Table C.49: Proximity to Flood Risk Zones**

Highly Vulnerable Development	Symbol
Within Zone 1	++
Within Defended Zone	?
Within Zone 2	??
Within Zone 3	--

Less Vulnerable Development	Symbol
Within Zone 1	++
Within Defended Zone	?
Within Zone 2	??
Within Zone 3	-

<b>Water Compatible</b>	<b>Symbol</b>
Within Zone 1	++
Within Defended Zone	++
Within Zone 2	++
Within Zone 3	++

Criteria 9(b): Proximity to Main Rivers and Lakes

*Sustainability implications:*

Proximity to the water environment could result in direct or indirect impacts (during construction or operation) on water quality and water environment features. Having regard to statutory requirements including those arising from the Water Framework Directive, this must be taken account of in evaluating the overall sustainability and thus suitability of candidate site allocations. Any sustainability impacts would also depend on the scale of development proposed. These will be considered in the later stages of the process.

**Table C.50: Proximity to Main Rivers and Lakes**

Description	Symbol
Beyond 2km from Main River or Main Lake	++-
Within 1 - 2km of Main River of Main Lake	
Within 500m - 1km of Main River or Main Lake	-
Within 500m of Main River or Main Lake	--

Criteria 9(c): Utilities Capacity (Power, Water Supply and Drainage)

*Sustainability implications:*

PPW11 requires planning authorities to protect water features, foster sustainable water management and consider the adequacy of utilities infrastructure when allocating development sites and making planning decisions. Development could exacerbate existing localised infrastructure constraints (potentially leading to adverse environmental effects including flooding) or require the installation of new/upgraded infrastructure where utilities networks are not already present or are insufficient to accommodate additional development of the scale proposed. In accordance with PPW11, this must be taken account of in evaluating the overall sustainability and thus suitability of candidate site allocations following discussions with utilities infrastructure providers. Any sustainability impacts would also depend on the scale of development proposed. These will be considered in the later stages of the process.

**Table C.51: Utilities Capacity (Power, Water Supply and Drainage)**

Description	Symbol
Surplus water utilities capacity available to service development and no mitigation required	++
Development likely to require only minor mitigation - e.g., local pipe diversion/connection	
Development would create a capacity shortfall - major mitigation required (e.g., treatment works)	-
Existing capacity shortfall which development would exacerbate	--

## **SA Objective 10: Materials and Waste**

### **Criteria 10(a): Proximity to Community Recycling Centres**

#### *Sustainability implications:*

Whilst lack of proximity to waste management facilities is not a fundamental constraint, this must be taken account of in evaluating the overall sustainability and thus suitability of candidate site allocations. Any sustainability impacts would also depend on the scale of development proposed. These will be considered in the later stages of the process.

**Table C.52: Proximity to Community Recycling Centres**

<b>Description</b>	<b>Symbol</b>
Within 1km of NPTC community recycling centre	++-
Within 1 - 2km of NPTC community recycling centre	
Within 2 - 5km of NPTC community recycling centre	-
Beyond 5km of NPTC community recycling centre	--

Criteria 10(b): Locational Need for Minerals Extraction

*Sustainability implications:*

Adequate minerals extraction is needed to support construction activity, with extraction closer to end uses resulting in less transport related environmental impacts. However, the working of mineral resources, as a finite resource, without clear evidence of a need for additional extraction, could unnecessarily deplete available resources and result in local adverse environmental impacts (noise, vibration, dust, traffic, etc). This must be taken account of in evaluating the overall sustainability and thus suitability of candidate mineral extraction site allocations. Any sustainability impacts would also depend on the scale of extraction proposed. These will be considered in the later stages of the process.

**Table C.53: Locational Need for Minerals Extraction**

Description	Symbol
Robust locational need for minerals extraction identified	++-
No locational need identified	?
No minerals extraction proposed	0

### **SA Objective 11: Sustainable Placemaking**

#### **Criteria 11(a): Previously Developed Land or Greenfield Land**

##### *Sustainability implications:*

PPW11 requires planning authorities to prioritise the use of suitable and sustainable previously developed land and/or underutilised sites for all types of development. This includes considering previously developed land and/or underutilised sites located within existing settlements first, before edge of settlement sites and then Greenfield land (as required to meet identified development needs). The approach recognises both the sustainability benefits of regenerating brownfield land (reduced environmental harm, improved sustainable transport, etc) and the range of adverse environmental effects likely to result from encroachment onto Greenfield land.

**Table C.54: Previously Developed Land or Greenfield Land**

Description	Symbol
Previously Developed Land	++-
Greenfield Land	--

Criteria 11(b): Proximity to Existing Active Travel Network

*Sustainability implications:*

Whilst lack of proximity to active travel routes is not a fundamental constraint, this must be taken account of in evaluating the overall sustainability and thus suitability of candidate site allocations. Any sustainability impacts would also depend on the scale of development proposed. These will be considered in the later stages of the process.

**Table C.55: Proximity to Existing Active Travel Network**

Description	Symbol
Within 400m of existing route	++-
Within 800m of existing route	
800-1200m of existing route	-
Beyond 1200m from existing route	--

**SA Objective 12: Cultural Heritage (incl. Welsh Language)**

**Criteria 12(a): Proximity to Scheduled Monuments**

*Sustainability implications:*

In accordance with statutory requirements, PPW11 requires development not to result in direct adverse effects on Scheduled Monuments, unless there are exceptional circumstances. Any predicted indirect or setting effects must also be balanced against the need for development, with any suitable mitigation applied. In the absence of mitigation (siting, design, construction techniques), development in proximity to a Scheduled Monument could result in unacceptable effects on its understanding, appreciation or cultural value. The potential for adverse impacts on Scheduled Monuments is an important consideration in determining the overall sustainability and thus suitability of candidate site allocations. Any sustainability impacts would also depend on the scale of development proposed. These will be considered in the later stages of the process.

**Table C.56: Proximity to Scheduled Monuments**

Description	Symbol
Beyond 2km from Scheduled Monument	++-
Within 1km - 2km of Scheduled Monument	
Within 1km of Scheduled Monument	-
Site includes Scheduled Monument	--

Criteria 12(b): Proximity to Scheduled Monuments

*Sustainability implications:*

In line with statutory requirements, PPW11 set out a general presumption in favour of the preservation or enhancement of a listed building and its setting, which might extend beyond its curtilage. In the absence of mitigation (siting, design, construction techniques), development of or in proximity to a Listed Building could result in unacceptable effects on its understanding, appreciation or architectural value, as well as resulting in wider landscape and visual effects. The potential for adverse impacts on Listed Buildings is an important consideration in determining the overall sustainability and thus suitability of candidate site allocations. Any sustainability impacts would also depend on the scale of development proposed. These will be considered in the later stages of the process.

**Table C.57: Proximity to Scheduled Monuments**

Description	Symbol
Beyond 2km from Listed Building	++-
Within 1km - 2km of Listed Building	
Within 1km of Listed Building	-
Site includes Listed Building	--

Criteria 12(c): Impacts on Important Archaeological Sites

*Sustainability implications:*

PPW11 sets out a presumption in favour of the physical protection in situ of nationally important archaeological remains unless there are exceptional circumstances. Any direct, indirect or setting effects on archaeological areas must also be balanced against the need for development, with any suitable mitigation applied. In the absence of mitigation (siting, design, construction techniques), development in proximity to an Important Archaeological Area could result in unacceptable effects on its understanding, appreciation or heritage value. The potential for adverse impacts on an Important Archaeological Area is an important consideration in determining the overall sustainability and thus suitability of candidate site allocations. Any sustainability impacts would also depend on the scale of development proposed. These will be considered in the later stages of the process

**Table C.58: Impacts on Important Archaeological Sites**

Description	Symbol
No likely impact on Important Archaeological Site	0
Likely minor adverse impact on Important Archaeological Site	-
Likely major adverse impact on Important Archaeological Site	--

Criteria 12(d): Effect on Designated Sites

*Sustainability implications:*

In accordance with statutory requirements, PPW11 sets out multiple requirements for development to avoid direct adverse effects on nationally important historic assets<sup>7</sup> and for the need for any development resulting in adverse effects on the historic environment to be robustly justified. In the absence of mitigation (siting, design, construction techniques), development in proximity to a designated heritage asset could result in unacceptable effects on its understanding, appreciation or heritage value. The potential for adverse impacts on designated heritage assets is an important consideration in determining the overall sustainability and thus suitability of candidate site allocations. Any sustainability impacts would also depend on the scale of development proposed. These will be considered in the later stages of the process.

**Table C.59: Effect on Designated Sites**

Description	Symbol
Potential minor adverse effects on designated site	-
Likely significant adverse effects on designated sites - mitigation required	--
No information available regarding potential effects	?

<sup>7</sup> For initial reporting on designated historic assets, please cross refer to NPT ISA RLDP Scoping Report.

Criteria 12(e): Re-Use of Historic or Culturally Important Buildings

*Sustainability implications:*

The reuse of historic or culturally important buildings recognises both the contribution of historic assets to a high-quality built environment and the sustainability benefits maximising the use of existing material assets. Development involving the loss of historic or culturally important buildings (where retention and potential restoration is possible) could result in unacceptable effects on the understanding, appreciation or value of the historic environment. The potential for the reuse of historic or culturally important buildings, or adverse effects on their setting or fabric, are important considerations in determining the overall sustainability and thus suitability of candidate site allocations.

Any sustainability impacts would also depend on the scale of development proposed. These will be considered in the later stages of the process.

**Table C.60: Re-Use of Historic or Culturally Important Buildings**

Description	Symbol
Proposed re-use of Historic or Culturally Important Buildings	++-
Proposal includes demolition of Historic or Culturally Important Buildings	--
No information available regarding use or demolition of Historic or Culturally Important Buildings	?

Criteria 12(f): Effect on Welsh Language

*Sustainability implications:*

The protection and increased use of the Welsh Language supports social and cultural wellbeing. The need to protect and increase the use of the Welsh Language is enshrined in legislation and Future Wales 2040 & PPW11 requires development planning to take into account the conditions necessary for the Welsh Language to thrive (and for its use not to diminish). Development resulting in demographic changes, economic development or educational changes could all directly or indirectly affect the use of the Welsh Language in existing and new communities. There is also an opportunity for developments to be sited and designed in ways which promote use of the Welsh Language, including by incorporating linguistic considerations into placemaking approaches. This is an important consideration in determining the overall sustainability and thus suitability of candidate site allocations. Any sustainability impacts would also depend on the scale of development proposed. These will be considered in the later stages of the process.

**Table C.61: Effect on Welsh Language**

Description	Symbol
Proposal would add 100 or greater residential units/ Proposal foremployment uses over 1000 sq.m in Welsh Language Sensitive Area <sup>8</sup>	--
Proposal for less than 100 residential units/ Proposal for employment uses under 1000 sq.m in Welsh Language SensitiveArea.	0

<sup>8</sup> NPT LDP has the following Welsh Language Sensitive Areas 1) Amman Valley 2) Swansea Valley, 3) Pontardawe and 4) Community of Crynant in theDulais Valley. These may be subject to alteration to be defined by the Council at any point.

**SA Objective 13: Proximity to SLA<sup>9</sup> or Heritage Coast**

**Criteria 13(a): Proximity to SLA10 or Heritage Coast**

*Sustainability implications:*

PPW11 defines SLAs as local areas of high landscape importance, which may be unique, exceptional or distinctive to the area, and advises that particular landscapes of the coastline should be recognised and protected where they represent significant characteristics of place. To protect and enhance both high quality landscapes and local distinctiveness, the features and qualities of SLA and Heritage Coasts should therefore be protected from significant adverse effects which undermine their integrity. This is an important consideration in determining the overall sustainability and thus suitability of candidate site allocations. Any sustainability impacts would also depend on the scale of development proposed. These will be considered in the later stages of the process.

**Table C.62: Proximity to SLA10 or Heritage Coast**

Description	Symbol
Beyond 2km from SLA or Heritage Coast	++-
Within 1km - 2km of SLA or Heritage Coast	
Within 1km of SLA or Heritage Coast	-
Site within SLA or Heritage Coast	--

9 Special Landscape Areas

Criteria 13(b): Proximity to Brecon Beacons National Park Boundary/ Dark Skies Area

*Sustainability implications:*

PPW11 defines SLAs as local areas of high landscape importance, which may be unique, exceptional or distinctive to the area, and advises that particular landscapes of the coastline should be recognised and protected where they represent significant characteristics of place. To protect and enhance both high quality landscapes and local distinctiveness, the features and qualities of SLA and Heritage Coasts should therefore be protected from significant adverse effects which undermine their integrity. This is an important consideration in determining the overall sustainability and thus suitability of candidate site allocations. Any sustainability impacts would also depend on the scale of development proposed. These will be considered in the later stages of the process.

**Table C.63: Proximity to Brecon Beacons National Park Boundary/ Dark Skies Area**

Description	Symbol
Beyond 2km from National Park Boundary/ Dark Skies area	++-
Within 1km-2km of Brecon Beacons National Park Boundary/ DarkSkies area	
Within 1km of National Park Boundary/ Dark Skies area	--

Criteria 13(c): Visual Amenity Impacts

*Sustainability implications:*

PPW11 defines SLAs as local areas of high landscape importance, which may be unique, exceptional or distinctive to the area, and advises that particular landscapes of the coastline should be recognised and protected where they represent significant characteristics of place. To protect and enhance both high quality landscapes and local distinctiveness, the features and qualities of SLA and Heritage Coasts should therefore be protected from significant adverse effects which undermine their integrity. This is an important consideration in determining the overall sustainability and thus suitability of candidate site allocations. Any sustainability impacts would also depend on the scale of development proposed. These will be considered in the later stages of the process.

**Table C.64: Visual Amenity Impacts**

Description	Symbol
No evidence of potential adverse visual amenity impact	0
Evidence of potential minor adverse visual amenity impact	
Evidence of potential major adverse visual amenity impact	--

Criteria 13(d): Individual Site Integration/ Coalescence/ Separation Impact

*Sustainability implications:*

PPW11 defines SLAs as local areas of high landscape importance, which may be unique, exceptional or distinctive to the area, and advises that particular landscapes of the coastline should be recognised and protected where they represent significant characteristics of place. To protect and enhance both high quality landscapes and local distinctiveness, the features and qualities of SLA and Heritage Coasts should therefore be protected from significant adverse effects which undermine their integrity. This is an important consideration in determining the overall sustainability and thus suitability of candidate site allocations. Any sustainability impacts would also depend on the scale of development proposed. These will be considered in the later stages of the process.

**Table C.65: Individual Site Integration/ Coalescence/ Separation Impact**

Description	Symbol
Proposal would integrate strongly with existing settlement structure	++-
Proposal likely to integrate with existing settlement structure	
Proposal detached from existing settlements or likely to result incoalescence (minor impact)	-
Proposal detached from existing settlements or likely to result incoalescence (major impact)	--

Criteria 13(e): Spatial Development Effect (incl. cumulative impact)

*Sustainability implications:*

PPW11 defines SLAs as local areas of high landscape importance, which may be unique, exceptional or distinctive to the area, and advises that particular landscapes of the coastline should be recognised and protected where they represent significant characteristics of place. To protect and enhance both high quality landscapes and local distinctiveness, the features and qualities of SLA and Heritage Coasts should therefore be protected from significant adverse effects which undermine their integrity. This is an important consideration in determining the overall sustainability and thus suitability of candidate site allocations. Any sustainability impacts would also depend on the scale of development proposed. These will be considered in the later stages of the process.

**Table C.66: Spatial Development Effect (incl. cumulative impact)**

Description	Symbol
No Change from individual site integration score	Same scoring as Individual Site Integration/Coalescence/separation Impact -
Allocation of site will have a cumulative impact	Relevant Comment/scoring

