



Cyngor Castell-nedd Port Talbot
Neath Port Talbot Council

Replacement Local Development Plan

2023-2038

Tests of Soundness Self-Assessment /
Collaboration Paper

December 2024



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Introduction

1.0.1 A key requirement of the development plan preparation process is to demonstrate that the Plan is 'sound'. This Background Paper assesses the draft Preferred Strategy against the *Tests of Soundness* set out by the Welsh Government in the Development Plans Manual (Edition 3). The Development Plan Manual states:

Section 64(2) of the Planning and Compulsory Purchase Act 2004 Act specifically provides that an LPA must not submit an LDP unless it considers the plan is ready for examination. This means that 'unsound' plans should not be submitted for examination. The LPA will need to demonstrate that the plan meets the three tests of soundness (set out in Table 27 of the Development Plans Manual).

1.0.2 In addition, the Development Plans Manual also emphasises that plans need to be prepared in accordance with *Preparation Requirements* set out in relevant legislation and regulations, and that this also needs to be demonstrated. Paragraph 6.27 of the DPM goes on to state:

The Welsh Government will monitor consistency with national policy throughout the LDP preparation process, and is likely to discourage submission if there is a fundamental conflict. If a plan is considered to be fundamentally unsound this will be drawn to the attention of the LPA so that any necessary action (i.e. withdrawal) is taken before submission. If the Welsh Government makes an objection based on soundness in the normal way, it will be considered at the examination.

1.0.3 Although the Preferred Strategy (Pre-Deposit Plan) is only the first major stage of the plan-making process, it is important to demonstrate at this stage that the process undertaken so far is sound and in accordance with all relevant requirements.

2 The Preparation Requirements and Tests of Soundness

The Preparation Requirements and Tests of Soundness

2.0.1 The Development Plans Manual (Edition 3) sets out *Preparation Requirements* and three *Tests of Soundness* that need to be addressed to ensure that an LDP is sound.

2.0.2 The Preparation Requirements are:

- Has preparation of the plan complied with legal and regulatory procedural requirements? (LDP Regulations, CIS, SEA Regulations, SA, HRA etc.?)
- Is the plan in general conformity with the National Development Framework (NDF) and/or Strategic Development Plan (SDP)? (when published or adopted respectively)

2.0.3 The Tests of Soundness are:

1. Does the plan fit? (Is it clear that the LDP is consistent with other plans?)
2. Is the plan appropriate? (Is the plan appropriate for the area in the light of the evidence?)
3. Will the plan deliver? (Is it likely to be effective?)

2.0.4 Questions listed under each test are provided to assist in indicating the matters that may be relevant for each test although the list is not exhaustive and may not apply in every case. These requirements, soundness tests and questions are set out and addressed in detail below.

2.1 Preparation Requirements

Has preparation of the plan complied with legal and regulatory procedural requirements?

2.1.1 The Preferred Strategy document has been prepared in accordance with all necessary procedural requirements. This includes undertaking and publication of the Interim Integrated Sustainability Appraisal (ISA) (which includes Sustainability Appraisal, Strategic Environmental Assessment, Equalities Impact Assessment, Health Impact Assessment and Welsh Language Impact Assessment) and the Interim Habitats Regulations Assessment (HRA). These are included in the Background Documents published to support the Preferred Strategy.

2.1.2 The main statutory requirements for plan preparation are set out in the Town and Country Planning (Local Development Plan)(Wales) Regulations (2005) (as amended 2015). The relevant Regulations in respect of the Pre-Deposit / Preferred Strategy stage are Regulations 5 to 11, 13 and 14. These are addressed below:

Regulations 5 to 10: Delivery Agreement

2.1.3 The Delivery Agreement (DA) sets out how and when an LDP will be delivered and comprises the Community Involvement Scheme (CIS) and the plan Timetable, as agreed with Welsh Ministers.

2.1.4 **Regulations 5 and 6** concern the CIS and set out persons to be engaged in the preparation of the CIS (i.e. the *general consultation bodies*) and its required content, including who will be involved and when, and how the LPA will respond to the process and responses received. The NPT RLDP CIS sets out these measures as required and details how the Council intends to consult and engage with stakeholders in a meaningful way at each stage of the LDP Process, providing details of groups, bodies and individuals who will be consulted. The Council has consulted on the DA, which has been with Welsh Ministers.

2.1.5 Regulations 7 and 8 concern the preparation and content of the timetable for the RLDP. This includes the persons who must be consulted in the preparation of the timetable and the key dates that must be included: definitive dates for each stage up to deposit stage and indicative dates for stages after this up to plan adoption. It also includes key dates for the publication of the sustainability appraisal report and annual monitoring report. The NPT RLDP Timetable sets out these required dates, was subject to consultation and has been agreed with Welsh Ministers as part of the DA.

2.1.6 Following the first 'call for sites' in 2022 and preliminary findings and information from Annual Monitoring Reports and growth projections it was concluded that there was need for additional housing land to be identified and infrastructure and viability matters that required more time to overcome. This resulted in the Council stopping the preparation of the RLDP and starting again with a new DA, amended plan period and timetable with commencement in November 2023 allowing for a second 'Call for Sites'. This amendment was also agreed with Welsh Ministers in accordance with the regulations.

2.1.7 Regulations 9 and 10 The Delivery Agreement: The DA (including the CIS and Timetable) was approved by Welsh Government in accordance with the Regulations. As part of this process, the DA was published and made available at the locations specified. Plan preparation (up to the current Preferred Strategy stage) has been completed in accordance with the details set out in the revised DA.

Regulations 11, 13 and 14

2.1.8 Regulation 11 Form and content of the LDP: The Replacement LDP Preferred Strategy document contains the name of the area, its anticipated expiry date, the stage reached and the date of publication and details the stage reached. The draft policies in the document are supported by reasoned justifications which are readily distinguishable.

2.1.9 Regulation 13 Additional Matters: Regard has been had to the additional matters specified in Regulation 13 in so far as they are applicable and relevant at this Preferred Strategy stage. These matters are: any local transport plan; any other matters under S108 of the Transport Act 2000; preventing and limiting the consequences of major accidents; the need to maintain appropriate distances between establishments and residential and public areas; the need for appropriate measures for the control of major accident hazards; the Waste Strategy for Wales; and any relevant local housing strategy. These matters have all been taken into account where necessary.

2.1.10 Regulation 14 Pre-Deposit Participation: Regulation 14(1) requires a Local Planning Authority to engage with stakeholders (specific consultation bodies and general consultation bodies as appropriate) to generate alternative strategies and options. For the development of the key issues, vision and objectives for the plan full engagement was undertaken in accordance with this requirement as set out in the *RLDP Key Issues, Vision and Objectives Background Paper*. In respect of the growth and spatial options, full consultation also took place with the consultation and engagement measures set out in full in the *Growth and Spatial Options Background Paper*.

2.1.11 Regulation 14(2) requires a Local Planning Authority to request nominations for sites proposed to be included in the LDP (candidate sites) and specifies how this should be done. As indicated above, two *calls for sites* under this regulation have been undertaken for

2 The Preparation Requirements and Tests of Soundness

the RLDP. Full details of this process undertaken in accordance with these requirements are set out in the *Candidate Sites Register (which includes the 2022 Call for Sites, the 2023 Call for sites and sites submitted as part of the Urban Capacity Study)*.

2.1.12 Full details of the consultation methods undertaken will be set out in the Initial Consultation Report prepared to accompany the Deposit Plan.

Is the plan in general conformity with the National Development Framework and/or Strategic Development Plan?

Future Wales - the National Plan 2040

2.1.13 *Future Wales - the National Plan 2040*, constitutes the Welsh Government's national development framework (NDF) which was published in February 2021. *Future Wales* (FW) forms part of the development plan system and must be considered alongside LDPs in development management decisions.

Level of Growth and regional apportionment

2.1.14 The level of growth set out in the Preferred Strategy is in general conformity with Future Wales' overall strategy. The steps taken to ensure regional apportionment are set out in Chapter 3 (below)

Future Wales Policies

2.1.15 The FW Policies relevant to the RLDP Preferred Strategy are considered in turn below, with a brief assessment of the conformity of the Preferred Strategy and proposed Strategic Policies with FW:

FW Policy 1 - Where Wales will grow and Policy 28 - National Growth Area - Swansea Bay and Llanelli

2.1.16 FW Policy 1 identifies three National Growth Areas (NGAs), one of which (Swansea Bay and Llanelli) incorporates part of Neath Port Talbot. The policy sets out that there will be growth in employment and housing and investment in infrastructure in the NGAs. Policy 28 gives more detail about the Swansea Bay and Llanelli NGA, stating that Local Development Plans should recognise the NGA as the focus for strategic economic and housing growth; essential services and facilities; advanced manufacturing; transport and digital infrastructure.

2.1.17 The RLDP Preferred Strategy in respect of the Spatial Options is Option F, aiming to provide the majority of growth in the NGA, through a co-location of jobs and homes focussed on the main centres of population, whilst seeking to protect, conserve and enhance opportunities in the Valleys Opportunity Area.

2.1.18 Relevant RLDP Objectives:

- **NO7:** Deliver sufficient good quality new homes of the required types in the most suitable locations to meet the identified need.
- **NO9:** Encourage and enable the establishment and growth of new clean green technologies and industries to promote and maintain a leading role for Neath Port Talbot in the national and international renewables and industrial economies.
- **NO10:** Ensure that all areas of Neath Port Talbot are able to benefit from economic growth and from modern economic infrastructure, including visitor attractions, appropriate to meet their economic, social, environmental and cultural needs and aspirations.

2.1.19 Relevant RLDP Strategic Policies:

- **SP1** Strategic Placemaking
- **SP6** Strategy Areas
- **SP11** Economic Recovery

2.1.20 The overall plan strategy and the above RLDP Objectives and Strategic Policies are considered to align with and promote the implementation of Policies 1 and 28 of Future Wales.

FW Policy 2 - Shaping Urban Growth and Regeneration - Strategic Placemaking

2.1.21 Key strategic placemaking principles are set out in FW Policy 2 and these are required to be followed when determining the pattern and location of new development. The Placemaking principles outlined include creating a mix of uses and variety of house types and tenures, building places at a walkable scale, ensuring development is built at appropriate densities and integrating green infrastructure.

2.1.22 Relevant RLDP Objectives:

- **NO5:** Support, enhance and enrich the distinctiveness of Neath Port Talbot's communities, including use of the Welsh language, through positive placemaking actions at a local level.
- **NO7:** Deliver sufficient good quality new homes of the required types in the most suitable locations to meet the identified need.
- **NO13:** Ensure the conservation, protection and enhancement of Neath Port Talbot's natural and historic assets and environments, green infrastructure, landscapes, undeveloped coast and coastal areas.

2.1.23 Relevant RLDP Strategic Policies:

- **SP1** Strategic Placemaking
- **SP5** Placemaking in Action
- **SP8** Housing
- **SP11** Economic Recovery
- **SP16** Green Infrastructure

2.1.24 Strategic placemaking and the principles outlined in FW Policy 2 have been fully embedded in the RLDP strategy as demonstrated by the above RLDP objectives and strategic policies.

FW Policy 6 - Town Centre First

2.1.25 FW Policy 6 states that significant new commercial, retail, education, health, leisure, and public service facilities must be located within town and city centres and that a sequential test must be used in determining the locations for such developments.

2.1.26 Relevant RLDP Objectives:

- **NO4:** Realise the full benefits of green economic growth across the county borough to provide fully sustainable communities in all localities while conserving Neath Port Talbot's environment.
- **NO8:** Encourage and support the retention and provision of a mix of community, retail, employment and recreational facilities in appropriate locations across the county borough.

2.1.27 Relevant RLDP Strategic Policies:

- **SP9:** Retail and Commercial Centres

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2.1.28 The requirements of FW Policy 6 are taken forward in the above RLDP objectives and strategic policy. Application of the sequential test in determining locations for the types of uses listed in FW Policy 6 will be undertaken as part of the next stage of plan preparation (Deposit Plan stage).

FW Policy 7 - Delivering Affordable Homes

2.1.29 FW Policy 7 re-affirms Welsh Government's aspiration to deliver significant levels of affordable housing, including through the planning system. The policy requires planning authorities to develop strong evidence-based policy frameworks to deliver affordable housing, including setting development plan targets based on regional estimates of housing need and local assessments. Planning authorities are required to identify sites for affordable housing led developments in response to local and regional needs and to explore all opportunities to increase the supply of affordable housing.

2.1.30 Relevant RLDP Objective:

- **NO7:** Deliver sufficient good quality new homes of the required types in the most suitable locations to meet the identified need.

2.1.31 Relevant RLDP Strategic Policy:

- **SP8:** Housing

2.1.32 RLDP Objective NO7 refers to the required types of housing, including Affordable Housing and Policy SP8 identifies a housing requirement of 4,167 dwellings (including a 20% flexibility allowance) and indicates that an Affordable Housing target will be identified and delivered through the setting of thresholds and targets. This, together with the identification of sites and other measures will be part of the next stage of plan preparation (Deposit Plan stage).

FW Policy 8 – Flooding

FW Policy 8 supports flood risk management that facilitates sustainable economic and national growth, promoting nature-based solutions and seeking to maximise social, economic and environmental benefits from flood risk management infrastructure.

2.1.33 Relevant RLDP Objective:

- **NO14:** Ensure that environmental issues and future changes including flood risk, coastal and fluvial change and pollution issues are appropriately avoided, addressed and adverse impacts minimised.

2.1.34 Relevant RLDP Strategic Policy:

- **SP18:** Environmental Protection

2.1.35 RLDP Objective NO14 includes the need to address flood risks while Policy SP18 covers a range of environmental protection issues including pollution and resource availability matters as well as flood risk and coastal erosion, with the requirement that these issues must be appropriately dealt with. The need and justification for any flood risk management measures in specific locations will be addressed as part of the next (Deposit Plan) stage.

FW Policy 9 - Resilient Ecological Networks and Green Infrastructure

FW Policy 9 requires action toward safeguarding and creating resilient ecological networks and promoting effective green infrastructure through placemaking. Existing and potential areas of importance for ecology and green infrastructure should be identified in development plans to promote and safeguard their functions and opportunities.

2.1.36 Relevant RLDP Objectives:

- **NO2:** Achieve a net biodiversity benefit and enhanced ecosystems resilience from new developments across the county borough.
- **NO3:** Ensure all new developments provide a healthy local environment that encourages more active and healthier lifestyles for all age groups.
- **NO13:** Ensure the conservation, protection and enhancement of Neath Port Talbot's natural and historic assets and environments, green infrastructure, landscapes, undeveloped coast and coastal areas.

2.1.37 Relevant RLDP Strategic Policies:

- **SP3:** Nature Emergency, Biodiversity and the Natural Environment
- **SP16:** Green Infrastructure

2.1.38 The above RLDP objectives accord with requirements of FW Policy 9; while RLDP Policy SP3 addresses FW requirements in respect of ecological networks with SP16 addressing Green Infrastructure requirements. More detailed policy requirements and the identification of areas for protection and safeguarding will be addressed at the next (Deposit Plan) stage.

FW Policy 11 - National Connectivity and Policy 12 - Regional Connectivity

2.1.39 These FW policies cover improvements to the rail, bus, strategic road network, national cycle network and EV charging. They state that planning authorities must maximise opportunities arising from investment in public transport and must integrate site allocations, new development, and infrastructure with active travel networks, and ensure that new development contributes towards their expansion and improvement where appropriate.

2.1.40 Relevant RLDP Objectives:

- **SP5:** Placemaking in Action
- **SP7:** Sustainable Transport

2.1.41 Relevant RLDP Strategic Policies:

- **NO3:** Ensure all new developments provide a healthy local environment that encourages more active and healthier lifestyles for all age groups.
- **NO6:** Reduce spatial inequalities in travel and transport across the county borough by improvements to Active Travel and public transport links and services, especially in valleys areas.

2.1.42 The above RLDP objectives support FW policies 11 and 12 and indicate an intention to promote public transport and active travel enhancements. RLDP Policy SP5 concerning placemaking includes the requirement that places should have access to sustainable transport options, while SP7 includes criteria in respect of the enhancement of the active travel and public transport networks, parking and electric vehicle charging provision and alternatives to road transport.

FW Policy 16 - Heat Networks

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2.1.43 FW Policy 16 indicates that the towns of both Neath and Port Talbot are *Priority Areas for District Heat Networks* where opportunities for such networks should be identified and planned for positively.

2.1.44 *Relevant RLDP Objectives:*

- **NO9:** Encourage and enable the establishment and growth of new clean green technologies and industries to promote and maintain a leading role for Neath Port Talbot in the national and international renewables and industrial economies.

2.1.45 *Relevant RLDP Strategic Policies:*

- **SP12** Renewable and Low Carbon Energy Generation

2.1.46 RLDP Objective NO9 would support new clean green technologies while policy SP12 indicates that a proportionate contribution will be made to meeting national renewable energy and energy efficiency targets. Further studies / information gathering during the Deposit Plan stage will assess the feasibility of identifying and developing DHNs in Neath and / or Port Talbot.

FW Policy 17 - Renewable and Low Carbon Energy and Associated Infrastructure and Policy 18 - Renewable and Low Carbon Energy Developments of National Significance:

FW policies 17 and 18 state that significant weight must be given to the need to meet Wales' international commitments and target to generate 70% of consumed electricity by renewable means by 2030 and that there is a presumption in favour of large-scale wind energy development (including repowering) in identified pre-assessed areas for wind energy. A significant area of the valleys of Neath Port Talbot is identified as part of a pre-assessed area for wind energy. FW Policy 18 contains detailed criteria for the determination of *Developments of National Significance* applications.

2.1.47 *Relevant RLDP Objectives:*

- **NO9:** Encourage and enable the establishment and growth of new clean green technologies and industries to promote and maintain a leading role for Neath Port Talbot in the national and international renewables and industrial economies.
- **NO11:** Enable Neath Port Talbot to make an appropriate contribution to renewable and low carbon energy generation while encouraging all appropriate steps to be taken to reduce energy demand and improve efficiency across all sectors.

2.1.48 *Relevant RLDP Strategic Policies:*

- **SP12** Renewable and Low Carbon Energy Generation

2.1.49 The above RLDP objectives indicate a strong support for renewable and low carbon energy technologies, while RLDP Policy SP12 states that such opportunities will be supported where appropriate.

FW Policy 31 - South West Metro

FW Policy 31 states that proposals for a Metro system are supported and growth and regeneration should be planned to maximise the potential opportunities arising from better regional connectivity.

2.1.50 *Relevant RLDP Objectives:*

- **NO1. Minimise the causes and adapt to the current and predicted impacts of climate change through:**
 - Minimising greenhouse gas emissions;
 - Requiring appropriate location and design of development; and
 - The protection and enhancement of all environmental assets required for climate adaptation and resilience.
- **NO6:** Reduce spatial inequalities in travel and transport across the county borough by improvements to Active Travel and public transport links and services, especially in valleys areas.

2.1.51 Relevant RLDP Strategic Policies;

- **SP1** Strategic Placemaking
- **SP5** Placemaking in Action
- **SP7** Sustainable Transport

2.1.52 FW Policy 31 refers to the South West Metro, but currently plans and proposals are at a very early stage. However, the above RLDP objectives and policies demonstrate that the overall plan strategy and proposals support the principles embodied in FW Policy 31, supporting placemaking principles of directing development to the most sustainable locations, prioritising sustainable transport links and making efficient use of infrastructure, and supporting opportunities to enhance the public transport network.

South West Wales Strategic Development Plan

2.1.53 There is currently no Strategic Development Plan (SDP) in place for South West Wales. The Corporate Joint Committee (CJC) was established in 2021, and in March 2023 published their corporate plan detailing how it will develop arrangements for strategic planning, transport, energy and economic development. Whilst work on the SDP has not formally started, cross boundary collaboration on various projects and evidence base studies through the RLDP will provide some of the foundations for work on SDPs. This is discussed further in Chapter 3, 'Regional Collaboration'.

2.2 Soundness Test 1: Does the plan fit?

Is it clear that the LDP is consistent with other plans?

2.2.1 Relevant other national, regional and local plans are identified and their provisions addressed as appropriate in the NPT RLDP Preferred Strategy itself and the other background papers and supporting documents including the in-combination assessments of the ISA. The ISA includes a full review of all relevant policies, plans and programmes and their influence in respect of the full range of RLDP topics including growth levels and spatial options and these factors have had a fundamental impact on the development of the Preferred Strategy and associated Strategic Policies.

2.2.2 Further information relating specifically to the various RLDP topic areas are contained within supporting documents and topic papers, and these and responses to the supporting questions below are considered to demonstrate that the RLDP Preferred Strategy has been prepared with full regard to all other relevant plans and strategies, whilst recognising that it will need to respond and develop as it progresses through its preparatory process.

2.2.3 The supporting questions for Soundness Test 1 are addressed below.

2 The Preparation Requirements and Tests of Soundness

Soundness Test 1 Questions

Does the plan have regard to national policy (Planning Policy Wales) and the NDF (Future Wales)?

2.2.4 The RLDP Preferred Strategy has taken into consideration all relevant national policy and guidance set out in Planning Policy Wales (Edition 12) and the associated Technical Advice Notes (TANs). The policy requirements of Planning Policy Wales have been considered and incorporated where relevant in the preparation of the Strategic Policies.

2.2.5 Conformity with Future Wales strategy and policies is addressed in detail in Section 2.1 above. The RLDP Preferred Strategy is considered to take forward and address the planning policy priorities identified in national policy in the Neath Port Talbot context. The Preferred Strategy and all associated evidence studies that have informed the plan, and are published alongside it have clearly referenced and accorded to national policies and these have been considered throughout the preparation process.

Does it have regard to the Well-being Goals?

2.2.6 The RLDP Preferred Strategy document has been prepared with full regard to the provisions and in the context of the Well-being of Future Generations Act 2015, the well-being goals and the five ways of working. In terms of the Well-being goals.

2.2.7 The RLDP Objectives were developed in the context of the Well-being goals and were analysed against each of the goals to ensure that they were all fully addressed (see Appendix C of the RLDP Key Issues, Vision and Objectives Background Paper). The relationship between the RLDP Strategic Policies and the RLDP Objectives are addressed in detail in Section 2.1 above.

Does it have regard to the Welsh National Marine Plan?

2.2.8 The Welsh National Marine Plan (WNMP) has been taken into account in the preparation of the RLDP Preferred Strategy. At this pre-deposit stage, it has been ensured that the RLDP Strategy proposals and strategic policies do not conflict with the provisions of the WNMP, and that the RLDP environmental protection policies complement the equivalent WNMP provisions. During the forthcoming preparation of the Deposit Plan, detailed development proposals and development management policies will be assessed to ensure that they align with the provisions of the WNMP.

Does it have regard to the relevant Area Statement?

2.2.9 In accordance with the Environment Act, Natural Resources Wales (NRW) have published Area Statements, which increase the understanding of the considerations around the natural resources in an area, the pressures on them and the benefits they provide. The NPT local authority area is within the area covered by the South West Wales Area Statement; information for the area is given about broad habitats; protected areas; national forest inventory; data on compliance with Water Framework Directive requirements; common land; and the Welsh Index of Multiple Deprivation.

2.2.10 The Area Statement has been taken into account from an early stage in the identification of the Key Issues, Vision and Objectives of the RLDP and the Preferred Strategy has been developed having regard to the Area Statement's four strategic themes: Reducing

health inequalities; Ensuring sustainable land management; Reversing the decline of, and enhancing, biodiversity; and Mitigating and adapting to a changing climate (cross cutting theme).

2.2.11 Strategic Policies SP3 Nature Emergency, Biodiversity and the Natural Environment; SP4 Health; SP16 Green Infrastructure and SP17 Countryside, Landscapes and Undeveloped Coast exemplify alignment with the Area Statement strategic themes.

Is the plan in general conformity with the NDF?

2.2.12 Conformity with Future Wales is examined in detail in Section 2.1 above.

Is the plan in general conformity with the relevant SDP (when adopted)?

2.2.13 There is currently no Strategic Development Plan (SDP) in place for South West Wales.

Is it consistent with regional plans, strategies and utility provider programmes?

2.2.14 The RLDP Preferred Strategy has been prepared within the context of the relevant regional plans, strategies and utility provider programmes. Chapter 3 below gives more details about NPT's regional context and collaboration work undertaken as part of pre-deposit preparation work and additional details are set out in the Preferred Strategy document and supporting topic papers. The Initial Sustainability Assessment (ISA) and Habitats Regulations Assessment (HRA) also consider the in-combination effects of the Preferred Strategy along with other plans and strategies in the region.

2.2.15 The preparation of the Preferred Strategy has involved a regional and coordinated approach to the collection of key pieces of evidence as set out in Chapter 3 below. In addition, regional working methods associated with areas such as waste and minerals are continued and are reflected in the Preferred Strategy.

2.2.16 Utility companies have been involved from an early stage in the development of the Infrastructure Delivery Plan and have been consulted on all candidate sites, sites submitted as part of the Urban Capacity Study and proposals that were filtered through the first stage of the assessment process, as outlined in the DPM. This input has influenced the growth and spatial strategies. Further detailed discussions with utility providers will follow as part of full assessment of detailed proposals as part of the preparation of the Deposit Plan.

Is it compatible with the plans of neighbouring LPAs?

2.2.17 The Preferred Strategy and background papers and information have taken into account cross-border issues where relevant, together with the strategies and proposals contained within adopted and emerging plans of neighbouring authorities. The Preferred Strategy and supporting documents reflect liaison, discussions and agreements reached in respect of various cross-border matters. In recognition of the value of working with neighbouring authorities, and in response to Planning Policy Wales and the Development Plans Manual emphasis on collaborative working, the Council has worked on several pieces of key evidence in partnership with adjoining authorities. These include undertaking joint studies, such as the Economic and Housing Growth Assessment with Swansea and shared methodologies for a number of studies (See Chapter 3) and stage 1 of a regional Strategic Flood Consequence Assessment.

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2.2.18 The settlement assessment has fully taken into account cross boundary linkages and relationships, for example areas in the Amman Valley having to links to Ammanford; the influence and importance of Swansea on many of NPT's communities and functional linkages between Ystalyfera in the Swansea Valley and Ystradgynlais. In addition, long standing regional working methods and planning policy approaches and proposals associated with subject areas such as waste and minerals are continued and reflected in the Preferred Strategy.

2.2.19 Further details are set out in Chapter 3 below.

Does it regard the Well-being Plan or the National Park Management Plan?

2.2.20 The NPT Well-being Plan was prepared by the Public Service Board and was published, following public consultation, in May 2023. The RLDP Key Issues, Vision and Objectives are drawn from and fully reflect all the NPT Well-being Plan's Well-being objectives. Particularly relevant are: *To ensure all our communities are thriving and sustainable; To ensure our local environment, culture and heritage can be enjoyed by future generations; and To ensure there are more secure, green and well paid jobs and that skills across the area are improved.*

2.2.21 As well as producing the Well-being Plan, the Public Services Board are a key stakeholder and have had the opportunity to engage in the preparation of the Preferred Strategy via the various engagement exercises undertaken.

2.2.22 NPT Council's Corporate Plan 2022 – 2027 (*Recover, Reset, Renew*) shares the same objectives as the Well-being Plan has also had a significant influence on the RLDP. In particular, the Corporate Plan was developed from an extensive *Let's Talk* campaign, an open-ended public engagement exercise undertaken during 2020 and 2021, together with written responses and questionnaire responses about the draft plan. The *Let's Talk* findings directly influenced the preparation of the Replacement LDP Vision and Objectives.

Has the LPA demonstrated it has exhausted all opportunities for joint working and collaboration on both plan preparation and the evidence base?

2.2.23 Examples of joint working and collaboration are set out above and in Chapter 3 below. It is anticipated that these will continue and be expanded and added to as an integral part of the preparation of detailed proposals for the finalised Deposit Plan. At this stage, full exhaustion of opportunities for joint working and collaboration has therefore not yet been achieved, but this process is on-going.

2.3 Soundness Test 2: Is the plan appropriate?

Is the plan appropriate for the area in the light of the evidence?

Soundness Test 2 Questions

2.3.1 The supporting questions for Soundness Test 2 are addressed below.

Is the plan locally specific?

2.3.2 The RLDP Preferred Strategy takes as its starting point the objectives of the Well-being Plan, and the Corporate Plan, which are locally specific and result from extensive local engagement:

- All children get the best start in life;
- All communities are thriving and sustainable;

- Our local environment, heritage and culture can be enjoyed by future generations;
- Local people are skilled and can access high quality, green jobs

2.3.3 . Along with other non-statutory engagement exercises with local stakeholders, these locally specific plans have informed development of the key issues for the RLDP and have directly influenced the Vision and Objectives within the Preferred Strategy.

2.3.4 The Preferred Strategy has been informed by a robust and locally specific evidence base including the following background papers:

- Key Issues, Vision and Objectives Background Paper
- Economic and Housing Growth Assessment
- Local Housing Market Assessment
- Employment Land Review
- Growth and Spatial Options paper

2.3.5 The full list of evidence base documents is in the Preferred Strategy document (Table 1.6.1)

2.3.6 Taking this approach, the Preferred Strategy responds to the locally specific issues and objectives, together with challenges that have been identified through stakeholder engagement. This also informs the growth and spatial options and identified strategy and strategic policies that address the key challenges and issues facing the NPT area.

Does it address the key issues?

2.3.7 As outlined above, the Preferred Strategy has been developed to address the key issues identified through the plan preparation process. This includes those identified in national, regional and local policy objectives, through stakeholder engagement and in the preparation of evidence together with the findings from the existing Adopted LDP (2011-2026) Review Report and Annual Monitoring Reports.

2.3.8 The process followed ensures that the identified key issues are explicitly addressed in the overarching plan vision and taken forward through identification of corresponding objectives and more specific strategies and policies specifically targeting identified issues.

Is it supported by robust, proportionate and credible evidence?

2.3.9 The Preferred Strategy document provides a list of Evidence Base documents (Table 1.6.1), demonstrating the range of evidence provided at this stage of the plan preparation process. Further evidence gathering is continuing as part of preparation of the detailed policies and proposals for the Deposit Plan and this will entail preparation of expanded and more detailed versions of many of the documents listed together with additional topic papers and background papers as required.

Can the rationale behind the plan's policies be demonstrated?

2.3.10 All the draft strategic policies are supported by information outlining the rationale behind each one, with further evidence contained in background documentation. The strategic policies need to be read in combination with one another and the supporting text to understand their relationship to the overall plan's vision, objectives and strategies.

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Does it seek to meet assessed needs and contribute to the achievement of sustainable development?

2.3.11 The RLDP evidence base includes detailed assessments of various relevant needs within the plan area. Relevant background documents include:

- Economic and Housing Growth Assessment (E&HGA)
- Local Housing Market Assessment (LHMA)
- Employment Land Review (ELR}
- Gypsy and Traveller Accommodation Assessment (GTAA)

2.3.12 A full list of background documents is in Table 1.6.1 of the Preferred Strategy document.

2.3.13 Population and household modelling has been completed, resulting in a number of housing and economic growth options being considered and the LHMA provides key evidence on the need for both open market and affordable housing within NPT.

2.3.14 The Preferred Strategy seeks to embody and promote sustainable development throughout all its policies and proposals. The chosen strategy option of embracing the importance of the National Growth Area and sustainable transport infrastructure while building on key opportunities in the valleys is intended to ensure that development is concentrated in sustainable places with good sustainable transport linkages while maintaining valleys communities.

2.3.15 The settlement hierarchy (See Settlement Assessment Paper) has been developed taking into account the sustainability credentials of each settlement in NPT. The hierarchy has assessed the availability of services and facilities in each settlement together with sustainable transport and employment opportunities. This work has informed the spatial strategy, with development being directed to the most sustainable settlements, while seeking to meet identified needs.

2.3.16 In order to ensure that the plan is fully embracing and delivering sustainable development, it is being assessed throughout by the Integrated Sustainability Appraisal (ISA). This is an iterative process which has had a major influence on plan preparation to date and will continue to shape all aspects of the plan as it progresses through the preparation process.

Are the vision and the strategy positive and sufficiently aspirational?

2.3.17 The RLDP vision has been developed to take into account the key issues and objectives identified through a wide ranging process of engagement with stakeholders and the public and it addresses the opportunities available in a positive way. The vision is considered to be aspirational and positive while remaining realistic and achievable within the relevant circumstances and timescales

2.3.18 NPT is facing a number of major structural economic and social changes and challenges. The Preferred Strategy identifies and acknowledges these while taking a positive view of the opportunities that are arising from them. Major structural industrial change has been a key theme in the area for many years, and continues to be of major significance now with the steelworks transition proposals and moves towards renewable and low carbon energy among other matters.

2.3.19 The Preferred Strategy is considered to address these matters robustly and to encourage an optimistic approach to drive forward the opportunities for new technologies, new types of job and new growth while supporting existing businesses, nature recovery and addressing climate change. The elements of the strategy that are outlined are considered to be as aspirational as possible in these circumstances and are intended to ensure that benefits are directed towards all parts of the county borough.

Have the ‘real’ alternatives been properly considered?

2.3.20 Significant information and evidence is available in the Preferred Strategy document and a range of background papers about the alternatives and options considered as part of the preparation of the Preferred Strategy. Seven growth options were identified based on a range of established and reliable projections for employment, building rates and housing needs. These are considered to be reasonable and realistic alternatives, and full consideration was given to each of these options. The growth options are set out in full in the Preferred Strategy document and the Growth and Spatial Options background paper.

2.3.21 For alternative options concerning the spatial distribution of new development to deliver the anticipated growth, six alternatives were identified. These are also set out in full in the Preferred Strategy document with detailed analysis in the Growth and Spatial Options background paper. Full information is given to demonstrate that these are reasonable and realistic alternatives, and full consideration was given to each of these options.

Is it logical, reasonable and balanced?

2.3.22 The Preferred Strategy has been informed by a clear understanding of the key themes and issues at a national, regional and local level. Its preparation has considered a range of growth and spatial options for the Plan area and has incorporated views expressed during a number of engagement exercises undertaken with various stakeholders and it has been informed by a robust and detailed evidence base.

2.3.23 It is considered to be set out in a logical and reasonable way to take a balanced approach to addressing the identified issues and challenges within the context of NPT. The approach taken reflects and meets the requirements of national planning policy and guidance and the need to produce a sustainable and deliverable RLDP whilst also integrating cohesively with other local, regional and national plans and strategies.

Is it coherent and consistent?

2.3.24 Taken as a whole, it is considered that the Preferred Strategy and background information and papers constitute a coherent and consistent proposal that provides the basis for the forthcoming RLDP to map out the future development of NPT. It sets the strategic direction that the Council will take in managing development through to 2037 and has been informed by, and is consistent with the Vision, Objectives, strategic growth and spatial options set out and the wider evidence base and the principles for sustainability and placemaking set out in national guidance.

Is it clear and focused?

2.3.25 The Preferred Strategy document is considered to be clear and logical in its approach, structure and format and this should help to clarify the connection between the various topics and elements covered in the strategy including all the elements required by national planning policy and guidance.

2 The Preparation Requirements and Tests of Soundness

2.3.26 It is considered to provide a clear explanation of the forthcoming plan's purpose in all its various subject areas including the overarching vision addressing the identified key issues for the Plan and how the Preferred Strategy will seek to address these.

2.4 Soundness Test 3: Will the plan deliver?

Is the plan likely to be effective?

Soundness Test 3 Questions

2.4.1 The supporting questions for Soundness Test 3 are addressed below.

Will it be effective?

2.4.2 As outlined above, the RLDP objectives have been arrived at through a process of public and stakeholder involvement including the identification of key issues and the vision for the plan, together with an understanding of local needs and aspirations. This approach is intended to ensure that the objectives represent a consensus about what the plan should aim to achieve.

2.4.3 The plan's policies and proposals are explicitly intended to address the objectives in land-use planning terms. At this stage, the Preferred Strategy and draft strategic policies have been formulated with stakeholder involvement and expert advice to address the identified objectives in the best way. Further involvement and engagement at this Preferred Strategy consultation stage will help to amend and refine the approaches taken as the plan is developed further and should help to deliver a plan that has the best chance of being effective in what it is aiming to achieve.

Can it be implemented?

2.4.4 The Preferred Strategy is considered to put forward a realistic and deliverable level of growth and spatial framework to deliver sustainable development. At this stage however, it is not in its final form or ready to be implemented. Detailed policies and proposals will need to be developed to provide the full framework through which to implement the Plan's strategy. This will involve more detailed assessment and development work including addressing matters such as viability, phasing and deliverability of sites as part of the preparation of the Deposit Plan.

Is there support from the relevant infrastructure providers both financially and in terms of meeting relevant timescales?

2.4.5 Infrastructure providers are an important component in developing the Replacement LDP and are key stakeholders in developing the new Plan. In this respect they have been and will continue to be engaged throughout the Replacement LDP preparation process. Discussions are ongoing with relevant infrastructure and utility providers and the provision and costs of site-specific infrastructure will be identified as part of the ongoing candidate site and viability work, and detailed within the Infrastructure Delivery Plan.

Will development be viable?

2.4.6 At this stage, full information about detailed policies and proposals is not available and detailed assessments on viability matters are not finalised. Initial site specific viability work has been undertaken, with site promoters for residential and employment proposals required to complete a Development Viability Model (DVM) to demonstrate viability. A series of viability assumptions were published as part of a Technical Working Group with industry

representatives and agreed through a Statement of Common Ground. A High-Level Viability Study, which outlines development viability across the Housing Market Areas has also been produced alongside the Preferred Strategy. Ahead of the Deposit Plan, this work will be updated and more detailed work undertaken to demonstrate proposals are viable, deliverable and can provide the necessary infrastructure to support the development. This will be based on any infrastructure improvements needed at the site level and on policy requirements set out in the RLDP.

Can the sites allocated be delivered?

2.4.7 At the pre-deposit plan stage, the Preferred Strategy does not allocate any sites. Site allocations will form part of the next stage of plan preparation, the Deposit plan which will also address issues of site deliverability. To date, a detailed Stage 2 assessment has been undertaken on all Candidate and Urban Capacity Sites, as outlined in the Council's Candidate Site Assessment Methodology. A summary of this assessment has been published in the Candidate Site Register, with the full assessment set to be published alongside the Deposit Plan.

Is the plan sufficiently flexible? Are there appropriate contingency provisions?

2.4.8 The Preferred Strategy is considered to outline a sufficiently flexible policy framework and to set the level of growth planned and its general distribution that is flexible enough to allow for changes and opportunities which may arise during the Plan period. The strategy also includes sufficient flexibility to be able to meet changing needs associated with addressing the challenges of an ageing population and sustaining local communities in the Plan area up to 2038.

2.4.9 The detailed site assessment work undertaken will ensure that all allocated sites are viable, deliverable and are likely to come forward in the plan period. However, to account for unforeseen circumstances, it is proposed to include a flexibility allowance of 20% in the housing requirement to ensure that the Plan remains effective in the event of any unforeseen circumstances which might arise through the Plan period.

Is it monitored effectively?

2.4.10 No monitoring framework has yet been prepared. This will form part of the next stage of plan preparation and will be developed and included within the Deposit Plan. Once the RLDP is adopted, the monitoring framework will be implemented and will form the basis for an Annual Monitoring Report (AMR). The AMR will be the main mechanism for measuring and assessing progress in the implementation of the policies and proposals of the adopted RLDP and for establishing whether any changes or revisions to the Plan are required. The monitoring framework will include appropriate indicators and triggers against which the implementation of the Plan will be assessed.

2.4.11 Production of the AMR will be in accordance with the relevant regulations and the AMR will be submitted to the Welsh Government by the 31st October each calendar year.

3 Regional Collaboration

Regional Collaboration

3.0.1 This section expands on the tests of soundness listed in Chapter 2, and provides further detail on the conformity with national policy, compatibility with other plans and regional collaboration.

Regional Context

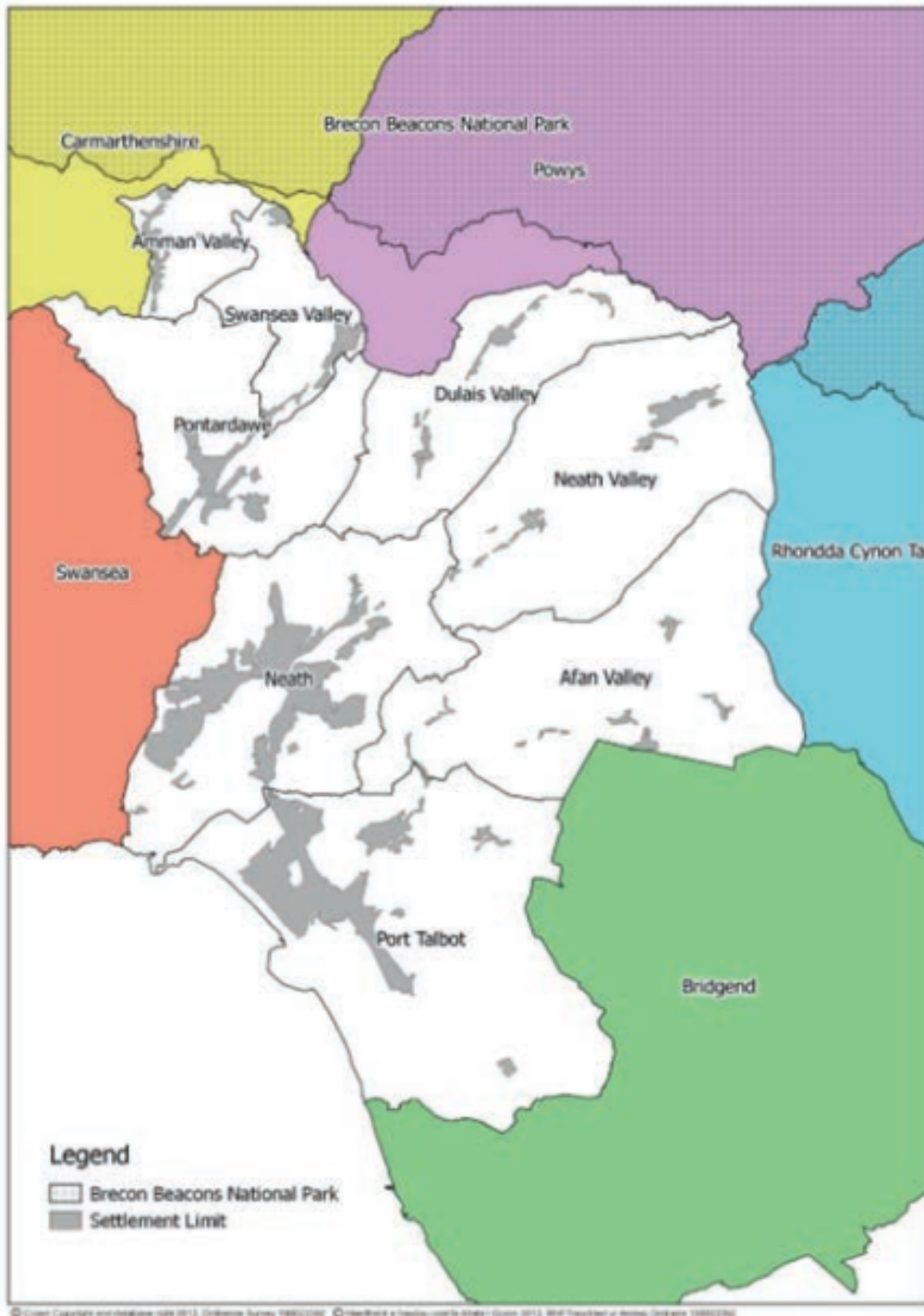
3.0.2 Neath Port Talbot County Borough contains a number of South Wales Valleys and an important coastal corridor. The County Borough shares its boundary with 6 Local Planning Authorities including the Swansea, Carmarthenshire, Bannau Brycheiniog, Powys, Rhondda Cynon Taf (RCT) and Bridgend, with whom various geographical and transport linkages are shared.

3.0.3 The Amman Valley crosses the boundary into Carmarthenshire and the Swansea Valley links from Ystradgynlais in Powys, through Pontardawe to Swansea. The M4 corridor runs from South East England and Bridgend in the east, to Swansea in the west and the A465 Heads of the Valleys road runs from the M4 at Llandarcy up the Neath Valley linking the County Borough to RCT and beyond to the English Midlands. Neath Port Talbot and neighbouring authorities are part of the Trans-European Route Network.

3.0.4 The London mainline railway line also runs through the county borough with stops at Neath and Port Talbot Parkway. There are a number of specialist freight lines, including the line which runs up the Dulais Valley which will service the Global Centre of Rail Excellence at Onllwyn. There is a deep water port at Port Talbot, one of only three in the UK, in addition to the docks and the wharfs on the River Neath. All of these provide key strategic links for businesses.

3.0.5 Neath Port Talbot has important east/west linkages with Swansea, in particular along the Fabian Way Corridor Strategic Development Area as identified in the adopted Swansea LDP including the Swansea University Bay Campus, and also in the Skewen area of NPT having direct links into the Birchgrove area of Swansea. Other important linkages include in the upper Swansea Valley where Ystalyfera directly adjoins the wider Ystradgynlais settlement, sharing many services, facilities and employment opportunities. Similarly, towards the east and south parts of Margam are adjacent to the important settlement area of Pyle and Kenfig Hill in Bridgend county borough, and Bryn (north east of Port Talbot) and Cymmer/Croeserw in the Afan Valley have strong links to Maesteg, also in Bridgend.

Figure 3.1 NPT LDP 2011-2026 Map 1.1 Spatial Context of Neath Port Talbot



3.0.6 Neath Port Talbot is situated within the South West Wales region according to Future Wales, but has key linkages to other regions including to the South East via Bridgend and North into Mid-Wales via the southern end of Powys.

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3.0.7 The figure below shows the Authorities within the SWW planning region which includes NPT, Swansea, Carmarthenshire, Pembrokeshire, parts of Bannau Brycheiniog and the Pembrokeshire Coast National Park. Of the Authorities within the region, all are at different stages in the RLDP preparation process at the date of this paper (December 2024):

- Bannau Brycheiniog - withdrew RLDP in June 2024, to commence a new Delivery Agreement in 2024/2025.
- Carmarthenshire County Council - at Examination in Public;
- Pembrokeshire Coast National Park - adopted RLDP, review has now commenced;
- Pembrokeshire County Council - at Deposit consultation;
- Neath Port Talbot Council - at Preferred Strategy Consultation;
- Swansea Council - Preferred Strategy consultation expected early 2025.

Figure 3.2 Future Wales South West Wales Regional Strategic Diagram



3.0.8 Policy 28 'National Growth Area – Swansea Bay and Llanelli' states that Swansea Bay and Llanelli will be the main focus for growth and investment in the South West region. LDPs should recognise this area as the focus for strategic economic and housing growth; essential services and facilities; advanced manufacturing; transport and digital infrastructure.

3.0.9 Neath Port Talbot also forms part of the Swansea Bay City Region and City Deal with Carmarthenshire County Council, Pembrokeshire County Council, Swansea Council, Abertawe Bro Morgannwg and Hywel Dda University Health Boards, Swansea University, the University of Wales Trinity Saint David and private sector companies.

Commuting and Travel to Work Areas (TTWA)

3.0.10 The County Borough has strong linkages with other authorities within the South West Wales region as can be demonstrated by the Travel to Work Areas and Commuting patterns.

3.0.11 The most recent commuting data shows that since the 2011 there has been an increase in the number of people commuting out of the area (3,500 increase in the number of people commuting out of the area and a 1,100 reduction in the number of people commuting into the area).

3.0.12 The Office for National Statistics 2021 Census data showed that 37.6% of people aged 16 years and over in employment in NPT travel less than 10km to work with 27.6% of people having to commute 10km and over to work. The data also showed that 21.1% of people predominately worked from home.

3.0.13 The 2021 Census was undertaken in March when the whole of the UK was in a Covid-19 lockdown; during this time many people were working from home. The Census data unsurprisingly recorded a substantial increase in homeworking and a corresponding decrease in commuting flows. Therefore, the quality of this census data has been called into question.

3.0.14 In terms of travel to work areas, data collated over the last decade (2013-22) by WG through the Annual Population Survey (APS), indicates that the majority of working residents, an average of 57%, stay in the County Borough for work or would have done during the COVID-19 pandemic had restrictions not been in place [WG (2023) Commuting patterns by Welsh local authority and measure, 2013 to 2022]. The latest Census, held at the height of the pandemic in March 2021, indicated that more residents, some 70%, worked in NPT at that point, although this was clearly influenced by restrictions and included 34% who were mainly working from home, with the Census asking for respondents' actual place of work rather than their normal workplace like the APS.

3.0.15 While the majority of residents work in NPT, a number do commute to work elsewhere, most often to Swansea according to the latest Census. The WG data offers less of a breakdown and does not report all destinations, but it reaffirms that Swansea, and to a much lesser extent Bridgend, has been the leading place of work for residents of NPT over the past decade, aside from the County Borough itself.

Table 3.0.1 Main Commuting flows from NPT (2021)

Place of Work	Number	Percentage
Working residents of NPT	59,185	100%
Worked from home or no fixed place of work	20,389	34%
Travelled to elsewhere in NPT	20,918	35%
Travelled to work in Swansea	9,302	16%
Travelled to work in Bridgend	2,871	5%
Travelled to work in Carmarthenshire	1,389	2%

3 Regional Collaboration

Travelled to work in RCT	761	1%
Travelled to work in Cardiff	760	1%
Travelled to work in Powys	749	1%

Source Census 2021

3.0.16 NPT also attracts people from elsewhere to fill its jobs, with 36,608 of those working in the County Borough as of the 2021 Census, excluding anyone working from home, not residing within it. The largest flows being 57% who lived in Swansea and 20% who lived in Bridgend.

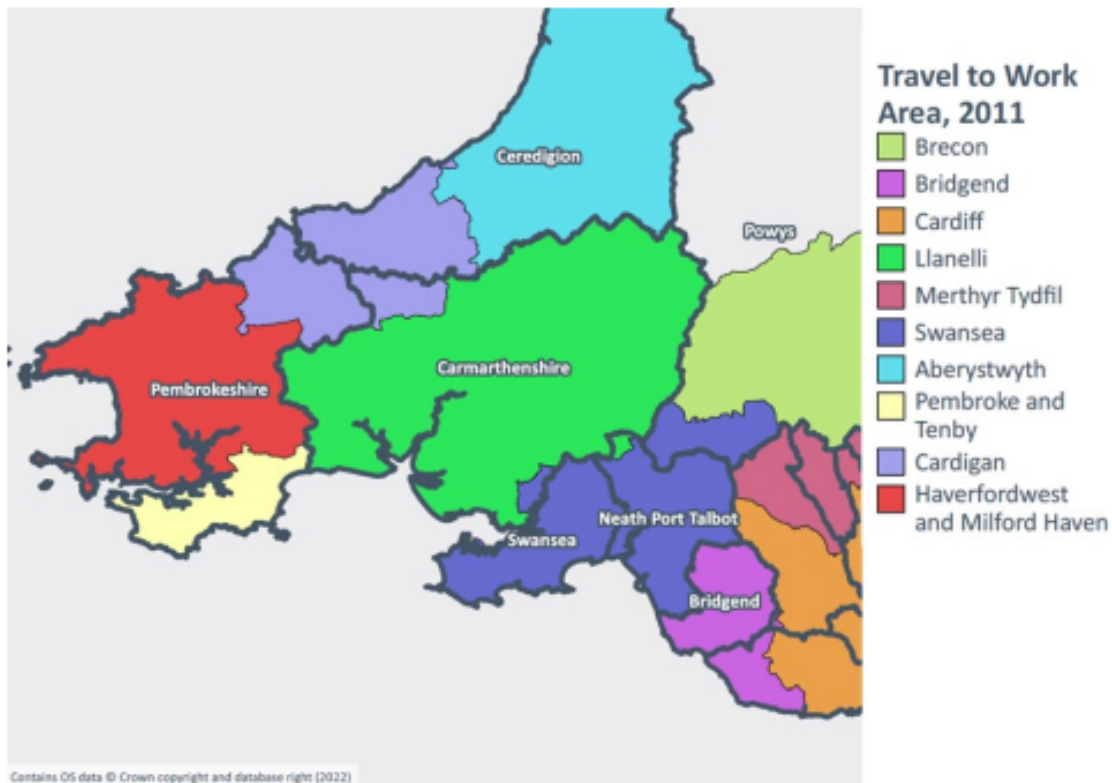
Table 3.0.2 Main Commuting flows to NPT (2021)

Place of residence	Number	Percentage
Individuals at workplaces in NPT	36,608	100%
Residents of Swansea	20,918	57%
Residents of Bridgend	7,162	20%
Residents of Carmarthenshire	3,446	9%
Residents of RCT	1,794	5%
Residents of Powys	913	2%
Residents of Cardiff	630	2%

Source Census 2021

3.0.17 The ONS used data from the 2011 Census to update its own defined TTWAs in 2016, seeking to 'approximate labour market areas' and 'reflect self-contained areas in which most people both live and work'. It aimed to define reasonably populated areas, not bound to local authority geographies, in which at least 75% of residents work and at least 75% of workers live. Areas with a working population in excess of 25,000 people were, however, allowed to contain as little as two thirds of their residents and workforce as part of a trade-off between workforce size and the level of self-containment [ONS (2016) TTWA analysis in Great Britain].

3.0.18 This process led to the identification of a Swansea TTWA which, as shown below, extended to cover almost all of NPT as well as parts of Powys and Carmarthenshire. Only the northernmost part of the County Borough, an area containing the villages of Cwmgors, Gwaun-Cae-Gurwen and Tairgwaith, collectively home to around 4,220 people as of 2021, was judged to have a stronger relationship with Llanelli and was thus allocated to that TTWA instead.

Figure 3.3 Travel to Work Areas 2011

Contains OS data © Crown copyright and database right (2022)

Source: ONS

Economic and Housing Market Areas

3.0.19 South west Wales LPAs worked together to commission a common evidence base for the Economic and Housing Growth Assessment. As part of this, consultants Turleys assessed the Functional Economic Market Areas (FEMA) for NPT. This was undertaken in order to consider the functional relationships between NPT and the other authorities within the South West Wales geography, as well as other proximate and adjacent authorities within the Plan making context. Turleys looked at the study area in its wider strategic/ policy context and then functional linkages including commuting, travel to work areas, migration, house prices and flows of goods, services, information and retail and consumer catchments. They then used this analysis to conclude on the extent to which NPT represents a distinct and self-contained functional economic market area geography. This was considered to be important in providing spatial context to the scenarios of growth which have an impact on the adjoining authorities with the strongest evidenced relationships.

3.0.20 Turleys concluded that it was reasonable to suggest that in determining a FEMA for NPT, NPT and Swansea could be broadly considered collectively. They however noted that each area does though still offer the opportunity for residents to live and work within their boundaries, with 69% of the working population of NPT either working from home or travelling to a workplace in the County Borough.

3.0.21 Beyond the relationships recognised specifically with Swansea, in particular in terms of commuting, Turleys also noted that the analysis also showed other important functional relationships. Showing a relationship with Bridgend for example, even if this is weaker than the one that exists with Swansea, no doubt reflecting the connections created by the M4, as

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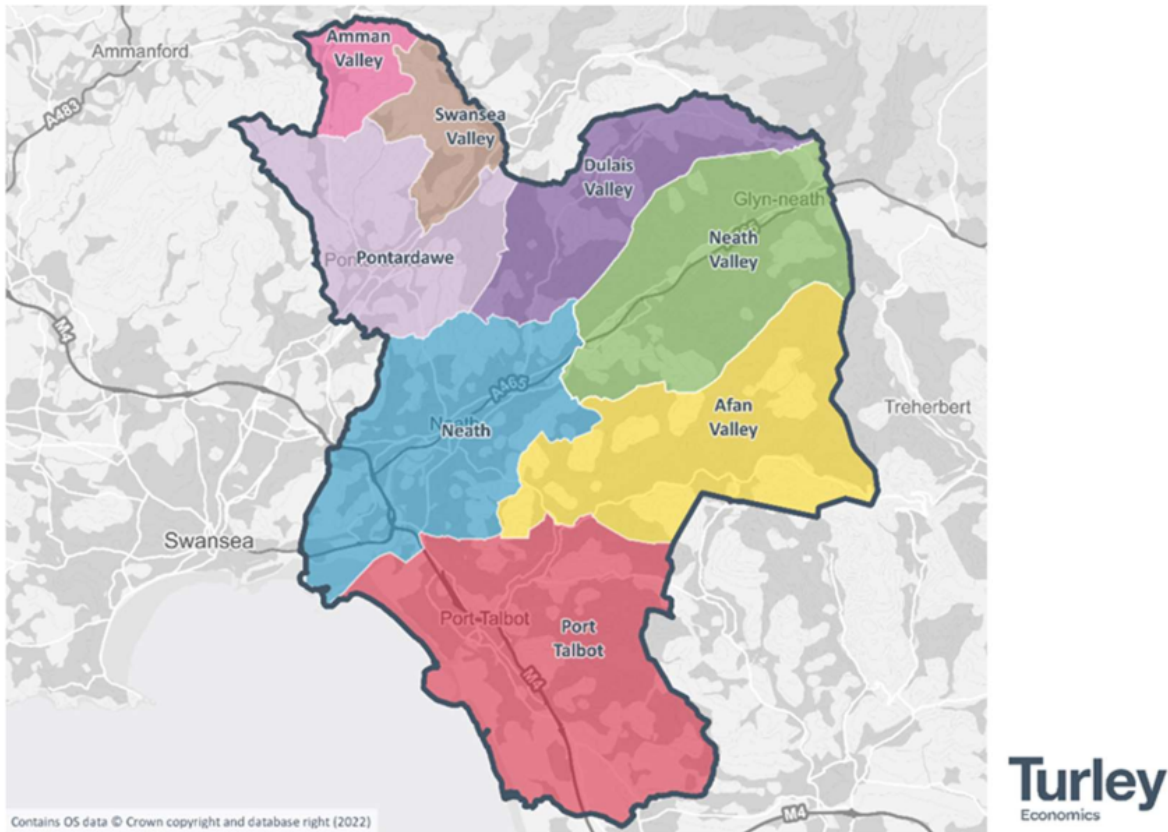
well as with Carmarthenshire which – unlike Bridgend – forms part of the established geography of South West Wales. Over twice as many people commuted to NPT from Bridgend than from Carmarthenshire, the next largest of the South West Wales authorities, and the same was found to be true of the outflow from NPT. With regards to Pembrokeshire, the other authority in South West Wales planning region, the report noted that the evidence suggested that the relationship with NPT was weaker at present, albeit noting that there is potential for this to change in the future with the development of the Freeport across the ports of Milford Haven and Port Talbot.

3.0.22 In May 2022 the WG reached an agreement with the UK Government to establish a freeport programme in Wales. In March 2023 it was announced that Port Talbot and Milford Haven joint Celtic Freeport would be established. The Freeport will be based around the port of Port Talbot in NPT, and the port of Milford Haven in Pembrokeshire. It will focus on low carbon technologies, such as floating offshore wind, hydrogen, carbon capture, utilisation, and storage and biofuels to support the accelerated reduction of carbon emissions.

3.0.23 The freeport aims to attract significant inward investment, including £3.5 billion in the hydrogen industry, generating £900 million in GVA by 2030, and £13 billion by 2050. The freeport will form a special zone with the benefits of simplified customs procedures, relief on customs duties, tax benefits, and development flexibility. They are designed to promote regeneration and high-quality job creation, become a national hub for global trade and investment across the economy, and foster an innovative environment.

3.0.24 As part of the Local Housing Market Assessment, consultants Turleys assessed the Housing Market Areas for NPT. They are based on the functional areas where people currently live and would be willing to move home without changing jobs. The eight spatial areas which are based on wards have been used as the basis for sub-market areas. In assessing the suitability of the spatial areas, local commuting lengths and average prices paid data was considered. The recent ward boundary changes were also acknowledged and considered as part of the work.

Figure 3.4 LHMA Figure 2.1 Spatial Areas



Regional working

3.0.25 Taking into consideration the regional linkages outlined above, this section details regional work undertaken to date. The Council has continued to work closely with neighbouring authorities and those within the region in a number of ways set out below.

3.0.26 Council officers have attended and participated in meetings of the Planning Officers Society of Wales, the South West Wales Planning Officers Group and the Regional Viability Group. In addition to meetings across the region, the Council have continued to hold regular meetings with all neighbouring authorities to discuss any cross-boundary issues, share best practise and discuss methodologies.

3.0.27 *The South West Wales Corporate Joint Committee (SWWCJC)* was formally constituted in January 2022. Its Corporate Plan 2023-2028 sets out its well-being objectives and refers to the South West Wales Regional Economic Delivery Plan and the preparation of a Regional Transport Plan and a Strategic Development Plan, although the preparation of the latter has not progressed to date. The SWWCJC has established a Strategic Planning Sub-Committee which NPTC has attended.

3.0.28 *Neighbouring Authorities:* In accordance with the requirements of PPW, the Council has corresponded with all neighbouring authorities to establish the opportunities for development on brownfield land outside of its own area or to assist NPT in meeting our housing requirement. To date, none of the neighbouring authorities have been able to identify suitable sites or have indicated that they would be able to assist with meeting NPT's housing requirement.

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3.0.29 There has been significant on-going cross-boundary liaison and collaboration in respect of RLDP key sites including Wildfox Adventure Resort (Afan Valley) and Coed Hirwaun (Margam) with Bridgend Council and the Global Centre for Rail Excellence, Onllwyn with Powys .

3.0.30 *Shared Methodologies:* The Council has shared methodologies for undertaking pieces of evidence base research and Swansea, Carmarthenshire and NPT have all used consultants Turleys to support the preparation of economic evidence in particular which demonstrates that a number of authorities in the NGA are applying a consistent approach towards considering the economic context and growth. Methodologies for the Employment Land Review, Green Infrastructure Assessment, Green Wedge Assessment, Best and Most Versatile Land, Renewable and Low Carbon Energy Assessment and Special Landscape Areas have also been shared.

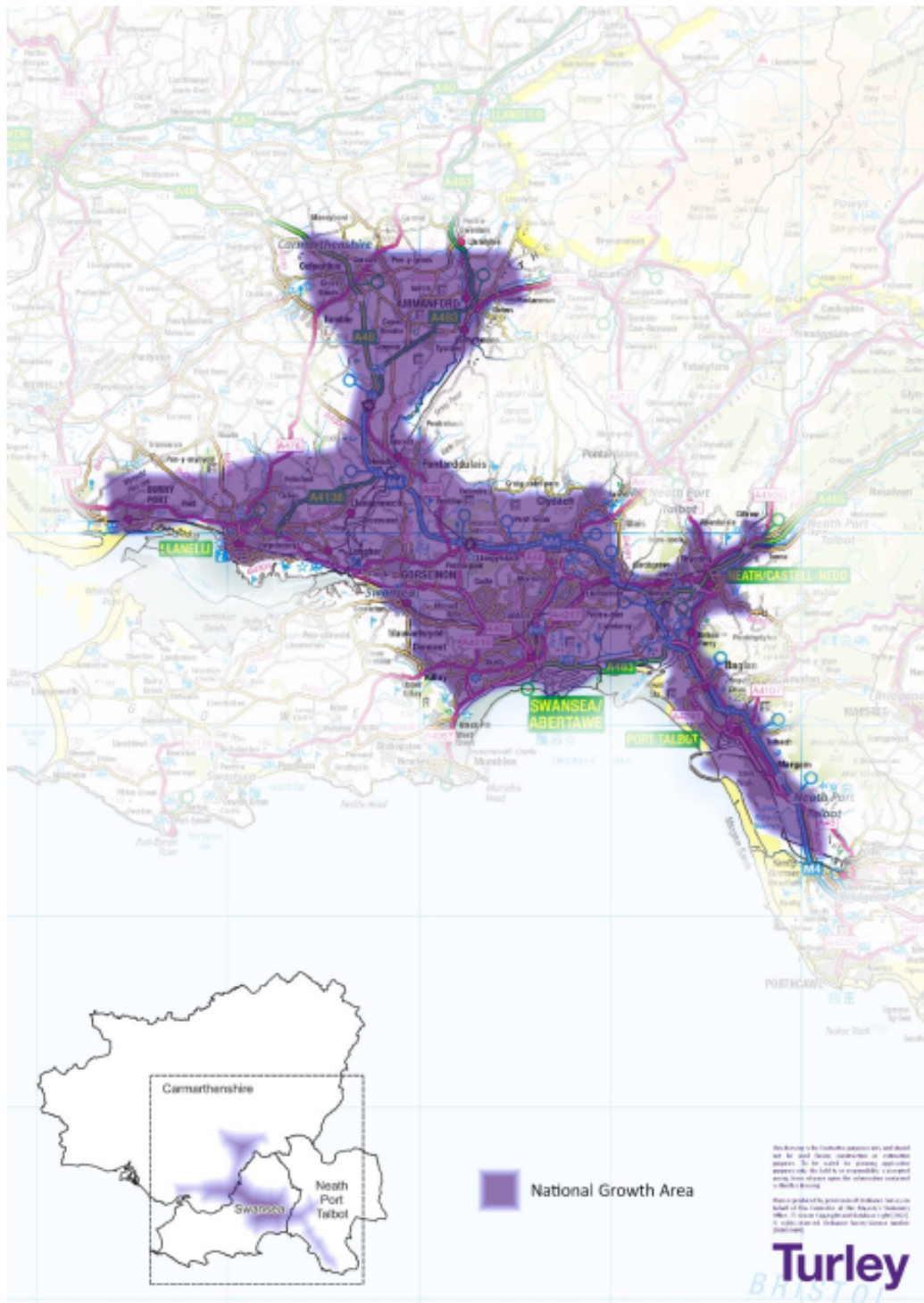
3.0.31 *Regional Commissions:* Work on a Strategic Flood Consequences Assessment (Stage 1) was commissioned as a joint regional project to cover the whole region, including additional specific flooding information for each individual local authority. Similarly, a regionally commissioned nutrient credit trading scheme is being developed, led by Carmarthenshire. In respect of minerals policy, regional discussions are ongoing regarding aggregate apportionment to inform the position for Deposit LDPs across the region.

3.0.32 *Development Viability Model (DVM):* Authorities in both the West Wales and Mid Wales regions have worked together with Andrew Burrows of *Burrows-Hutchinson* on the development and implementation of a DVM for use by all the Authorities. This is now being rolled out as a common approach across most of Wales. The DVM is a spreadsheet based appraisal tool capable of assessing the overall levels of viability in sub areas of an authority, as well as for testing the suitability and deliverability of specific sites for inclusion in a Development Plan.

3.0.33 *Swansea Bay and Llanelli National Growth Area (NGA):* NPT, Swansea and Carmarthenshire councils have worked together to commission a common evidence base to refine the definition of the NGA. In the interests of regional collaboration, Pembrokeshire, whilst outside of the NGA were involved and consulted. The Definition Project Research Report considered a wide range of factors across the study area including functional spatial geographies, house prices, population and employment density, economic output expressed as Gross Value Added (GVA), settlement hierarchies of respective adopted LDPs, strategic transport and public service infrastructure, active travel network maps, Swansea Bay and West Wales metro, economic assets and the Welsh Language.

3.0.34 It also considered constraints to national growth such as environmental protection designations and areas of flood risk. Other issues such as agricultural land classification, pre-assessed areas for wind energy and Heat Priority areas, green wedge designations and spatial policy matters such as special landscape areas were also included. This work culminated in the spatial representation provided below:

Figure 3.5 An indicative spatial representation of a refined NGA spatial area



3.0.35 Economic and Housing Growth Assessment and the Local Housing Market Assessment: Turleys were jointly commissioned by Swansea and NPT to prepare these studies. As part of this evidence, cross-border housing and jobs markets and travel to work

3 Regional Collaboration

patterns were considered. Turleys have also undertaken an economic assessment for Carmarthenshire; therefore, all authorities within the NGA have used a similar methodology for assessing economic requirements.

3.0.36 *Welsh language:* Welsh speaking ability within the County Borough and adjoining authorities has been taken into consideration in the Welsh Language Topic Paper.

3.0.37 *Draft Position Statement on Regional Collaboration:* Carmarthenshire has prepared this with NPT's involvement. This paper is dated April 2024 and it is understood that it remains in draft form.

3.0.38 All of the above are considered to demonstrate the Council's commitment to working collaboratively with other partner organisations and to show how NPT recognises its key location and position within the wider region and NGA.

De-risking Plan Checklist

A.1 The Development Plans Manual includes a de-risking plan checklist. At this Preferred Strategy stage, not all aspects will have been addressed, but the checklist and responses are set out below to provide an overall assessment of the current position.

Is the plan in general conformity with the NDF and SDP (when adopted)?

A.2 Yes. Conformity with the NDF (Future Wales - the National Plan 2040) has been addressed in detail in Chapter 2 above. There is currently no SDP in place for South West Wales.

Involve key stakeholders at the right time.

A.3 Stakeholder involvement has been undertaken to date in accordance with the Delivery Agreement. The Topic Papers also contain sections on engagement.

A detailed candidate site process. Ensure that delivery and viability is embedded in the candidate site process from the outset.

A.4 The detailed Candidate Sites process that has been undertaken is set out in detail in the Candidate Sites Assessment Methodology, with the candidate site assessments (in respect of sustainability, deliverability and viability) included within the Candidate Sites Register.

Achieving the right development in the right place. Ensure the strategy is based on a robust assessment of the role and function of places in line with the gateway test, search sequence and National Sustainable Placemaking Outcomes, as set out in PPW.

A.5 At this Preferred Strategy stage, this aspect is still on-going. A detailed settlement assessment for the whole county borough area has been undertaken to establish the role and function of places in order to inform the strategy, including the identification of potential key sites (see Key Sites Background Paper). Further work will be undertaken during the forthcoming Deposit plan preparation stages.

A more meaningful and deliverable preferred strategy.

A.6 The Preferred Strategy and supporting documents provide significantly more detail and information than previous plans at this stage on the implications of the proposed strategy in terms of the future shape and character of NPT, providing a more meaningful document. Deliverability has been assessed, as set out above, and it is considered that the proposals have been shown to be deliverable as far as possible at this stage.

Effective use of placemaking tools.

A.7 In broad terms, as far as applicable at this strategic stage, strategic placemaking aspects have been fully considered. More detailed placemaking approaches will be undertaken during the forthcoming plan preparation stages for the Deposit Plan.

Appendix A: De-risking Plan Checklist

Plan for realistic housing and economic growth levels based on a robust consideration of need and supply factors, taking into account affordable housing need, viability and deliverability.

A.8 It is considered that the Preferred Strategy plans for realistic levels of housing and economic growth. Full details, including affordable housing need and viability and deliverability are set out in supporting papers, in particular the Local Housing Market Assessment (LHMA), the High Level Viability Study (HLVS), the Population and Housing Topic Paper; and the Employment Topic Paper.

Include an appropriate level of flexibility within the housing and job provision to allow for unforeseen circumstances.

A.9 The Preferred Strategy is considered to outline a sufficiently flexible policy framework and to include sufficient flexibility to be able to meet changing needs. An allowance has been made in the Plan for choice and flexibility to provide businesses and developers with a reasonable choice of sites and allow for delays in sites coming forward. Without this there would be a risk that job growth would be constrained due to a shortage of available space, particularly in NPT where vacancy rates are low.

A.10 A flexibility allowance of 20% in the housing requirement is proposed. This flexibility allowance has been chosen to enable the RLDP's housing requirement to remain deliverable if a significant unforeseen scenario, such as delays to several key sites should occur. Given the extent and robustness of evidence underpinning each proposed allocation, 20% is considered sufficient to ensure the Anticipated Annual Build Rate (AABR) will remain deliverable throughout the plan period.

Allocate a range and choice of deliverable sites in appropriate locations to ensure the plan's strategy can be delivered.

A.11 At this Preferred Strategy stage, sites to be allocated are yet to be finalised. However, all of the successfully filtered candidate sites have been through the Integrated Sustainability Appraisal process and have also been assessed (using the CS assessment methodology) in terms of viability, sustainability and deliverability.

Consider the availability of specific interventions (e.g. funding streams, compulsory purchase) from the public and/or private sector that can assist site delivery to unlock sustainable brownfield sites.

A.12 Consideration has been given to the potential for special interventions in respect of some potential development sites, but proposed sites to be allocated will not be finalised until the Deposit Plan stage.

Consider the reality of the land bank to be delivered. Sites unlikely to be delivered should be de-allocated and not 'rolled forward' from the previous plan. It could be prudent to identify such sites separately as regeneration sites which do not count towards the housing requirement.

A.13 Allocation sites have yet to be finalised (see above).

Plan for realistic windfall rates, based on robust evidence of past delivery rates and the small sites register.

A.14 Section 8.4 of the Population and Housing Topic Paper explains the approach we have taken to gather the evidence to justify a realistic windfall allowance. However further work will be undertaken to supplement the findings of this paper together with the Urban Capacity Study including a range of sources of delivery such as demolitions, estate renewal, sub-divisions, unit mergers and changes of use.

Prepare a housing trajectory. Plan for realistic phasing and delivery rates: An appreciation of the time it will take to bring all elements of the provision forward to ensure the anticipated annual build rate can be achieved.

A.15 Preparation of the housing trajectory is on-going taking into account the factors listed. The finalised trajectory will be included in the Deposit Plan.

Ensure the plan is supported by a viability appraisal that is underpinned by relevant and robust assumptions. This should remove the need for further assessments at the planning application stage, only in exceptional circumstances (as set out in PPW)

A.16 A high-level viability assessment has been prepared to accompany the Preferred Strategy. Candidate Sites have been assessed in terms of viability. More detailed work will be undertaken in respect of the finalised plan proposals for the Deposit Plan.

Assumptions underpinning the financial viability assessment include an appropriate contingency to ensure development can come forward.

A.17 A contingency level has been included within the viability work. This has been agreed with the Viability Stakeholder Working Group. Further work will be undertaken to inform the Deposit Plan.

Prepare an Infrastructure Plan: Identify necessary infrastructure.

A.18 An Infrastructure Delivery Plan (IDP) has been prepared as one of the Preferred Strategy supporting papers. Further work will be undertaken ahead of the Deposit Plan.

Understanding constraints and infrastructure requirements, including the timing and how they are funded will be critical to demonstrate how they can be delivered and/or mitigated.

A.19 An Infrastructure Delivery Plan has been prepared. The matters referred to will be considered in greater detail as part of Deposit Plan preparation.

Know developers and their capacity to deliver in the future. Maximise opportunities for a range and choice of sites/developers.

A.20 Detailed deliverability assessments have been undertaken on successfully filtered candidate sites. We have held meetings with landowners / promoters of key sites and met with site promoters of previously allocated sites. Only sites that have been assessed as being deliverable have been included within the housing trajectory to meet the Plan's identified housing need.

The affordable housing policy should have percentage targets and thresholds that relate to viability study evidence base. Where they differ, e.g. for locally specific circumstances. This should be clearly justified and explained.

A.21 Initial work has been undertaken to inform the Preferred Strategy, this will however be built upon for the Deposit plan as there has been a change in climate since the viability work was undertaken.

Gypsy and Traveller Provision: Ensure an up-to-date evidence base for the plan period and where there is a need, the identification of deliverable allocation(s)

A.22 The Gypsy and Traveller Accommodation Assessment sets out information available at this stage. Specific allocations will be considered further during Deposit Plan preparation.

Consider effective mechanisms for monitoring, review, and implementation.

A.23 This will be addressed at Deposit stage.

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Cyngor Castell-nedd Port Talbot
Neath Port Talbot Council