

**From:** [Ceri Morris](#)  
**To:** [NDF](#)  
**Cc:** [REDACTED]  
**Subject:** NDF Response: Neath Port Talbot Council  
**Date:** 22 October 2019 16:37:24  
**Attachments:** [image002.jpg](#)  
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[NDF Consultation - NPT Council Response \(22-Oct-19\).pdf](#)  
**Importance:** High

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Dear Sir/Madam,

**Draft NDF Consultation**

Please find attached a response on behalf of Neath Port Talbot Council.

With regards – Ceri.

**Ceri Morris**

**Planning Policy Manager / Rheolwr Polisi Cynllunio**

Neath Port Talbot County Borough Council / Cyngor Bwrdeistref Sirol Castell-nedd Port Talbot

[REDACTED]

We welcome correspondence in Welsh and will deal with Welsh and English correspondence to the same standards and timescales.

Croesewir gohebiaeth yn y Gymraeg a byddwn yn ymdrin â gohebiaeth Gymraeg a Saesneg i'r un safonau ac amserlenni.

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## Consultation Response Form

Your name	Nicola Pearce
Your address	Head of Planning and Public Protection, Neath Port Talbot Council, The Quays, Brunel Way, Baglan Energy Park, Neath, SA11 2GG
Preferred Contact Details (email/phone/post)	[REDACTED]
Organisation (if applicable)	Neath Port Talbot Council

### 1. NDF Outcomes (Chapter 3)

The NDF has proposed 11 Outcomes as an ambition of where we want to be in 20 years' time.

- Overall, to what extent do you agree or disagree the 11 Outcomes are a realistic vision for the NDF?

Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree	<i>Don't know</i>	<i>No opinion</i>
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

- To what extent do you agree with the 11 Outcomes as ambitions for the NDF?

Agree with all of them	Agree with most of them	Agree with some of them	Agree with none of them	<i>Don't know</i>	<i>No opinion</i>
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

- If you disagree with any of the 11 Outcomes, please tell us why:

Broadly agree, as the outcomes essentially cover most of the important and relevant topics and are based on the national planning principles and national sustainable placemaking outcomes set out in Planning Policy Wales.

It is considered however that a reference to '*conserving culture and distinctiveness*' should be added. Whilst noting that Outcome 4 relates specifically to the Welsh language, there is nothing about places which are distinctive and the need to value and conserve their historic inheritance/environments' etc. This is considered to be an important omission.

## 2. Spatial Strategy (Policies 1 - 4)

The NDF **spatial strategy** is a guiding framework for where large-scale change and nationally important developments will be focused over the next 20 years.

- To what extent do you agree or disagree with the spatial strategy and key principles for development in...

	Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree	<i>Don't know</i>	<i>No opinion</i>
Urban areas (Policies 1, 2 & 3)	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Rural areas (Policy 4)	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

- If you have any comments on the spatial strategy or key principles for development in urban and rural areas, please tell us:

The spatial strategy set out in the draft NDF is broadly supported. The Council welcomes the fact that Swansea Bay and Llanelli is identified as one of three 'National Growth Areas' and in particular welcomes the recognition of the role and contribution that the towns of Neath and Port Talbot can provide with the wider national and regional context.

In respect of Policy 4 (Supporting Rural Communities), it is assumed that the provisions of this policy relates to all remaining areas of Wales outside of the identified centres of national and regional growth. If this is the case, this should be clarified within the document.



### 3. Affordable Housing (Policy 5)

The NDF sets out the approach for providing affordable housing, encouraging local authorities, social landlords, and small and medium-sized construction and building enterprises to build more homes.

- To what extent do you agree or disagree with the approach to increasing affordable housing?

Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree	<i>Don't know</i>	<i>No opinion</i>
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

- If you disagree, in what other ways can the NDF approach the delivery of affordable housing?

The approach to increasing affordable housing is supported as the approach commits to ensuring that all members of society have access to housing, especially those unable to afford to buy on the market.

It should be recognised however, that issues surrounding viability continue to pose a problem in relation to achieving such high targets in certain parts of Wales, including Neath Port Talbot. As such, these targets/aspirations may not be achievable and/or will be subject to viability assessments.

### 4. Mobile Action Zones (Policy 6)

- To what extent do you agree or disagree the identification of mobile action zones will be effective in encouraging better mobile coverage?

Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree	<i>Don't know</i>	<i>No opinion</i>
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

- If you disagree, in what other ways can the NDF improve mobile phone coverage in the areas which currently have limited access?

The policy intent to improve mobile coverage and to better position the plan-led planning system in Wales to help facilitate improvements is understood and supported.

## 5. Low Emission Vehicles (Policy 7)

- To what extent do you agree or disagree that policy 7 will enable and encourage the roll-out of charging infrastructure for ultra-low emission vehicles?

Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree	<i>Don't know</i>	<i>No opinion</i>
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

- If you disagree, in what other ways can the NDF enable and encourage the roll-out of charging infrastructure for ultra-low emission vehicles?

The policy intent to encourage the use of ULEVs and to better position the plan-led planning system in Wales to help facilitate improvements to the availability of charging infrastructure is understood and supported.

## 6. Green Infrastructure (Policies 8 & 9)

- To what extent do you agree or disagree with the approach to maintaining and enhancing biodiversity and ecological networks?

Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree	<i>Don't know</i>	<i>No opinion</i>
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

The recognition of the importance of biodiversity enhancement, ecosystem resilience and green infrastructure is welcomed. The Council in particular welcomes the acknowledgement that the 'right trees need to go in the right places' – any consideration of where the right place is needs to involve local knowledge.

## 7. Renewable Energy and District Heat Networks (Policies 10-15)

- To what extent do you agree or disagree with the NDF's policies to lower carbon emissions in Wales using...

	Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree	<i>Don't know</i>	<i>No opinion</i>
Large scale wind and	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>



solar developments							
District heat networks	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

- If you disagree with the NDF's approaches to green infrastructure, renewable energy or district heat networks, what alternative approaches should we consider to help Wales to enhance its biodiversity and transition to a low carbon economy?

The principle of including NDF policies to lower carbon emissions in Wales is certainly understood and supported.

In specific respect of on-shore large scale wind and solar developments however, there is concern that the cumulative effect of changes in regulations and the introduction of NDF policy appears to be that Welsh Government are largely taking control of renewable energy and are effectively imposing large scale wind and solar farm development across significant parts of Neath Port Talbot and indeed other local authority areas across Wales.

In addition, no reference is made to alternative provision of renewable energy through on/in building generation. Technological advances are indicating that energy generation will be moving towards a system of end user generation – no reference is made to this within the document.

Currently, there is no information about how PPW and TAN 8 will be amended to reflect the NDF approach, including the extent to which Welsh Government and other decision makers will be required to take into account regional and local planning policy in determining renewable energy proposals, especially where there may be contradictions.

Furthermore, there is no information about the extent to which SDPs and LDPs will be required to comply with the NDF Energy Priority Area boundaries (which are inevitably 'high level' and imprecise) when drawing other local landscape and environmental designation boundaries.

In respect of the 'Energy Priority Areas Map', the map is of such a scale and resolution that it is difficult to identify the areas in detail. Also, the 'traffic light based approach' embedded within the policy has not been transposed onto the map – this needs further consideration.

It is also unclear as to whether existing provision within the existing TAN8 Strategic Search Areas has or will be taken into account.

Clarification is therefore sought and considered essential in respect of these matters.

In regard to District Heat Networks, whilst the Council supports the identification of Neath as a priority area for such networks, it is suggested that Port Talbot should also be identified. Local knowledge, experience and existing land uses would suggest that Port Talbot has significant potential for such networks. The Authority has already



undertaken a feasibility study into district heating solutions as a consequence and this proved positive. The Authority is therefore in the process of pursuing a project entitled 'Smart Low Carbon Port Talbot' which is in conjunction with a private partner.

## 8. The Regions (Policy 16)

- To what extent do you agree or disagree with the principle of developing Strategic Development Plans prepared at a regional scale?

Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree	<i>Don't know</i>	<i>No opinion</i>
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Given that many policy areas cut across local planning authority boundaries, the Council supports the principle of developing SDPs.

In terms of progressing a SDP, discussion has already taken place between the constituent local planning authorities across the Mid and South West Wales region. From the discussions to date, it has however emerged that the timing of a SDP will be primarily driven and dictated by available resources and the implications of the respective LDP 'drop dead' dates.

Given current levels of resources (particularly staff), it is considered to be extremely difficult (if not impossible) for any Local Planning Authority needing to progress an LDP review (to avoid their drop dead date), to be involved in parallel with the preparation of a SDP. Given the position of more than one LPA in the region, this is likely to delay the progression of a SDP in the region.

In order to facilitate the timely emergence of SDPs therefore, it is essential that the Welsh Government give consideration to the means available to limit the impact of the drop dead dates whilst the first round of SDPs (and LDP 'Lites') are put in place.

The NDF identifies three overall regions of Wales, each with their own distinct opportunities and challenges. These are North Wales, Mid and South West Wales, and South East Wales.

## 9. North Wales (Policies 17-22)

We have identified Wrexham and Deeside as the main focus of development in North Wales. A new green belt will be created to manage the form of growth. A number of coastal towns are identified as having key regional roles, while we support growth and development at Holyhead Port. We will support improved transport infrastructure in the region, including a North Wales Metro, and support better connectivity with England.

North West Wales is recognised as having potential to supply low-carbon energy on a strategic scale.

- To what extent do you agree or disagree with the proposed policies and approach for the North Region?

Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree	<i>Don't know</i>	<i>No opinion</i>
<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

No comment (*as policies are specific to North Wales*).

## 10. Mid and South West Wales (Policies 23-26)

Swansea Bay and Llanelli is the main urban area within the region and is our preferred location for growth. We also identify a number of rural and market towns, and the four Haven Towns in Pembrokeshire, as being regionally important. The haven Waterway is nationally important and its development is supported. We support proposals for a Swansea Bay Metro.

- To what extent do you agree or disagree with the proposed policies and approach for the Mid and South West Region?

Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree	<i>Don't know</i>	<i>No opinion</i>
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

The policy framework for the Mid and South West Wales region is supported. The Council welcomes the fact that Swansea Bay and Llanelli is identified as one of three 'National Growth Areas' and in particular welcomes the recognition of the role and contribution that the towns of Neath and Port Talbot can provide with the wider national and regional context.

In respect of other settlements across Neath Port Talbot, it is assumed that the provisions of Policy 4 (Supporting Rural Communities) apply – i.e. that appropriate proportionate growth is supported in these communities. If this is the case, this should be clarified within the document.

In terms of the regional housing need figure (i.e. 23,400), clarification is sought as to why this figure has not been extrapolated up to 2040 (i.e. the end of the NDF period). Currently, the figure appears to only relate to the period up to 2038. Furthermore,



although the base-date of the plan is quoted as 2020, the affordable housing requirement for the first 5 years is quoted to cover 2018/19?

In addition, the constituent authorities across the MSWW region are nearing completion of a cross border 'Housing Market Assessment' that based on housing needs will calculate how many homes will be needed within the region and the percentage of affordable housing that will be required. This evidence will inform subsequent LDP growth strategies and policy allocations and will also be required to conform with the NDF.

It is understood that the NDF housing figure for the region is based on the most up-to-date 2014 projections. Clarification is therefore requested on whether this housing figure will be subject to review/change following the release of the 2017 projections (expected in Oct/Nov'19).

Clarification on all these matters is considered to be essential.

The policy specifically supporting the development of the Swansea Bay Metro is welcomed. The Metro clearly provides an opportunity to improve transport integration / accessibility and also improve integration of land use and transport planning across the region.

Unlike the South Wales Metro however, there is no information within the background evidence clarifying the rationale behind it, the route and what impacts (positive or negative) could result. This should be addressed and clarified.

## 11. South East Wales (Policies 27-33)

In South East Wales we are proposing to enhance Cardiff's role as the capital and secure more sustainable growth in Newport and the Valleys. A green belt around Newport and eastern parts of the region will support the spatial strategy and focus development on existing cities and towns. Transport Orientated Development, using locations benefitting from mainline railway and Metro stations, will shape the approach to development across the region. There is support for the growth and development of Cardiff Airport.

- To what extent do you agree or disagree with the proposed policies and approach for the South East Region?

Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree	<i>Don't know</i>	<i>No opinion</i>
<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

No comment (*as policies are specific to South East Wales*).

If you have any comments about the NDF's approach or policies to the three regions, please tell us. If you have any alternatives, please explain them and tell us why you think they would be better.

Refer above – no further comments.

## **12. Integrated Sustainability Appraisal**

As part of the consultation process, an Integrated Sustainability Appraisal (ISA) was conducted to assess the social, economic and environmental impacts of a plan. The report identified a number of monitoring indicators, including health, equalities, Welsh language, the impact on rural communities, children's rights, climate change and economic development.

- Do you have any comments on the findings of the Integrated Sustainability Appraisal Report? Please outline any further alternative monitoring indicators you consider would strengthen the ISA.

No comment.

## **13. Habitats Regulations Assessment**

As part of the development of the NDF, a Habitats Regulations Assessment (HRA) was undertaken. The purpose of the HRA process is to identify, assess and address any 'significant effects' of the plan on sites such as Special Areas of Conservation and Special Protection Areas for birds.

- Do you have any comments on the Habitats Regulations Assessment report?

No comment.

## **14. Welsh Language**

We would like to know your views on the effects that the NDF would have on the Welsh language, specifically on opportunities for people to use Welsh and on treating the Welsh language no less favourably than English.

- What effects do you think there would be? How could positive effects be increased, or negative effects be mitigated?

No comment.



Please also explain how you believe the proposed NDF could be formulated or changed so as to have:

- I. positive effects or increased positive effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language, and
- II. no adverse effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language.

No comment.

## 15. Further Comments

- Are there any further comments that you would like to make on the NDF, or any alternative proposals you feel we should consider?

**NDF Structure** – given that the NDF is the spatial expression of Planning Policy Wales (PPW), it was expected that the NDF would follow a common structure around the themes set out in PPW. Given however that the structure of PPW10 is complex, convoluted and confusing, the simpler and more straightforward approach to the structure of the NDF is both supported and welcomed.

**Spatial Direction** – although the draft NDF is described as a ‘spatial plan’, in reality there is limited or no spatial information for a number of topics. Whilst the NDF spatially covers topics such as growth areas, onshore wind and solar and district heat networks, other potentially spatial policies (e.g. Mobile Action Zones, biodiversity enhancement, national forests etc.) are not and appear to be set aside for a later date, stating that the WG ‘will identify’ areas/sites. This approach is questionable.

**Background Evidence** – on review of the various background documents available, it is apparent that there are a number of inconsistencies, inaccurate information and omissions throughout the supporting evidence. This is of significant concern, given that in certain instances these errors will undoubtedly have had an influence on the development of the policies and designations (e.g. the identification of the ‘Energy Priority Areas’).

Although not exhaustive, the following list provides some examples of the more notable issues identified within the background evidence base:

- *Table of Primary Settlements* – indicates that Neath has a population of just 4,209 and Port Talbot a population of just 37,575. This is clearly incorrect.
- *Employment & Commercial Maps* – existing major retail / commercial sites and centres in Neath Port Talbot are incorrectly named and smaller (major) employment sites within the area are not mapped.
- *Green Wedges & Environmental Designations Maps* – incorrectly states that Neath Port Talbot has no Green Wedges.
- *Environmental Designations All-Wales Map* – no Historic Parks and Gardens,

- Air Quality Management Area, Conservation Areas etc. shown.
- *Existing Waste Sites Map* – unlike other authorities, there is no reference to Neath Port Talbot's Household Waste Recycling Centres.

It is widely recognised and accepted that accurate and 'sound' evidence on which to base policy is of fundamental importance – only then can the reader have confidence in the policy framework presented. As a means of comparison, it is suggested that if individual LDPs were submitted with similarly flawed and inaccurate evidence, 'soundness' of the plan would certainly be called into question and in extreme cases, Inspectors could potentially adjourn examination proceedings to enable the authority to address any problems identified.

The shortcomings of the evidence base should therefore be addressed and where appropriate and relevant to do so, the NDF policy provisions should be amended accordingly.

## 16. Are you...?

Providing your own personal response	<input type="checkbox"/>
Submitting a response on behalf of an organisation	<input checked="" type="checkbox"/>
<b>Responses to the consultation will be shared with the National Assembly for Wales and are likely to be made public, on the internet or in a report. If you would prefer your response to remain anonymous, please tick here</b>	<input type="checkbox"/>