

Report



Cabinet

Part 1

Date: 7 April 2021

Subject Replacement Local Development Plan: Post Consultation Endorsement of Review Report and Delivery Agreement

Purpose To report on the consultation responses received during public consultation on the Draft Review Report and Draft Delivery Agreement for the Replacement Local Development Plan (LDP) and seek approval of the updated documents. This is the first stage of the review process of the LDP and will set the direction of travel, timetable and engagement strategy for the Replacement LDP.

Authors Planning Policy Manager

Ward All wards.

Summary The Review Report (RR) is a key part of the evidence base. In summary, it sets out the key legislative, national and policy changes that have occurred since the adoption of the LDP in 2015 and includes an assessment of the current LDP to evaluate what policies are working and which policies may need review.

The Delivery Agreement (DA) comprises two key elements. A timetable setting out how the Council will manage the programme for preparing the LDP, and the Community Involvement Scheme (CIS) which sets out who, when and how the Council will consult and engage during the production of the LDP.

Following Cabinet's decision to progress with a review of the LDP, a Review Report (RR) and Delivery Agreement (DA), required by Regulations, have been drafted and were made available for public consultation during January – March 2021. Recommended responses to the feedback and suggested amendments to the documents have been collated for approval. Once these documents are endorsed by Cabinet, the next stage is to report them to Full Council (April 2021) for consideration and agreement that they can be formally submitted to Welsh Government. The formal submission of these documents to Welsh Government is a Full Council decision as this triggers the legal commencement of the LDP review.

Proposal **Cabinet is asked to consider and approve the recommended responses to the feedback received during consultation and endorse the updated versions of the Review Report and Delivery Agreement. Cabinet is then asked to agree for these documents to be reported to Full Council (in April 2021) with the intention of seeking approval for formal submission to Welsh Government. Following submission, Welsh Government approval of the Delivery Agreement would then mark the legal commencement of the LDP review.**

Action by Acting Head of Regeneration, Investment and Housing

Timetable Immediate

This report was prepared after consultation with:

- Chief Executive
- Head of Finance – Chief Finance Officer
- Head of Law and Regulations – Monitoring Officer
- Head of People and Business Change

Signed

1. REVIEW REPORT

Background

- 1.1 In October 2020, the Council agreed for a formal review of the LDP is to begin. The draft Review Report (RR) sets out the first stage in this process. The RR is a key part of the evidence base underpinning the form and context of the reviewed plan. The RR has been informed by the recent public consultation¹, the adopted monitoring framework set out in the current LDP, contextual changes to legislation and relevant strategies, as well as the collation and analysis of other evidence to make an informed and robust conclusion.

Consultation Feedback

- 1.2 The consultation period saw 25 individual stakeholders provide comments on the draft RR. These comments are set out in full in Appendix A of this report. Each comment has been considered and a recommended response and any proposed amendment to the RR is also set out in Appendix A. It is important to note that changes to the adopted LDP, as identified in the RR, can only be made at plan revision stage and therefore the recommended Council response reflects this.
- 1.3 A consultation form with five specific questions along with a general comments section was provided (see background papers); 12 of the 25 respondents utilised the form. The response rate was not particularly large, but the responses showed a general trend which is set out below.
- 1.4 The majority of respondents...
- ...thought that the main issues that should be considered in the full LDP review were identified in the RR.
 - ...thought that the existing vision, issues and objectives remain relevant for a revised plan.
 - ...agreed that the adopted Spatial Strategy of a new plan needs reviewing.
 - ...agreed with the findings of the policy review.
 - ...thought the plan needed to be revised, however there was confusion on what this meant with most stating they wanted both a short and full form revision. A few comments were made that questioned whether all elements of the plan required full revision.
- 1.5 The consultation responses raised the following key points:
- The involvement of the Future Generations Commissioner for Wales, noting that planning is a priority area in delivering the well-being goals.
 - The value and importance of the Gwent Levels, with requests to halt any development within that location. The impact of the large renewable energy schemes is a real concern.
 - With the Welsh Government declaration of a biodiversity and climate change emergency, the effectiveness of current policy to protect and enhance ecology was raised.
 - A support for the continuation of a brownfield strategy and the need to ensure the plan strategy does not lead to social detriment.
 - The role and importance of mineral planning for Newport and the region.
 - Lost opportunity in Newport for access to the river for recreation and lifeboat services.
 - Agree with the need to review the tourism policy and how important this is to Newport economically.
 - The need to take into account the impact from Covid 19 and to use planning as a tool to aid recovery.
 - The importance and opportunities that result from Heritage and its role in the Newport Offer.
 - The need to focus on the regeneration of the City Centre.
 - The opportunities arising from national and regional public transport improvements.

¹ A list of those bodies consulted is available in Appendix C of this report.

- 1.6 In light of the consultation responses, no significant changes have been proposed to the RR. The issues raised are matters to consider in the development of the replacement plan and the RR has been updated to reflect any omissions of the key concerns raised through consultation; each proposed change is set out in full Appendix A. The proposed amendments include updates to policy that had occurred during the consultation period, reference to missing evidence base element i.e. village assessments and mineral surveys and the addition of specific matters within the policy review section. This is to ensure that when the policy is reviewed, these matters will be considered e.g. effectiveness of monitoring of ecological impacts from development.

Conclusion

- 1.7 It is concluded that the updated Review Report (see Background Papers) sets out a clear and robust overview of the issues that need to be considered by a replacement LDP. There is a need to look at the spatial strategy and at a minimum, consider those matters raised in the policy review section. The Draft Review Report concluded that a Full Revision of the current LDP is required and this remains the conclusion following the consultation process.

2. DELIVERY AGREEMENT

Background

- 2.1 The Delivery Agreement (DA) is a mandatory requirement of the LDP process and is considered to be a key tool for the speedier production of land use plans. The DA comprises the Timetable (setting out how the Council will manage the programme for preparing the LDP) and The Community Involvement Scheme (CIS) – (setting out who, when and how the Council will consult and engage with various stakeholders, including the general public, during the production of the LDP).

Consultation Feedback

- 2.2 The consultation period saw 15 respondents provide comments on the draft DA. These comments are set out in full in Appendix B of this report. Each comment has been considered and a recommended response and any proposed amendment to the DA is also set out in Appendix B.
- 2.3 The consultation responses raised the following key points:
- Support for the proposed timetable;
 - Helpful links to stakeholders that had not been identified in the draft were provided;
 - Questioned the Impact on engagement with Covid-19;
 - Enforced the need for transparency of decisions making through the RLDP process.
- 2.4 In light of the responses, no significant changes have been proposed or made to the DA and no changes to the proposed timetable have been requested or made. In terms of the impact of Covid 19 on engagement practices we can confirm that all engagement and consultation stages of the RLDP will have regard to any lockdown or restrictions in place. Any appropriate adjustments, including re- scheduling of consultation will be considered at each stage of the plan preparation. The request for transparency is an important one. Feedback and clarification of processes in plan preparation are important and each stage of the plan preparation will be undertaken in line with government guidance.

Conclusion

- 2.5 It is concluded that the updated Delivery Agreement (see Background Papers) sets out a clear and robust overview of the issues that need to be considered by a replacement LDP.

3. Next Steps

- 3.1 Following endorsement of these documents, the next step will be to seek Full Council's endorsement (April 2021) in order to formally submit the RR and DA to Welsh Government. Agreement of the DA marks the legal formal start of the plan preparation/revision process and binds the LPA into delivering within the stated timescales and using agreed consultation processes. The DA will need to be kept under review and any future changes required to the DA will need to be confirmed and agreed with WG.

4. Financial Summary

- 4.1 The RLDP process has a project specific budget to cover costs of all resources associated, including additional staff, consultations, commissions, examination processes etc. The resources required for the RLDP process are set out in the Delivery Agreement. The cost of consultation will be met from the current Planning Policy and Local Development Plan budgets and reserve. The table below sets out an estimated cost for the RLDP which has been based on the previous LDP and neighbouring authority costs. The table identifies a potential budget pressure towards the end of RLDP process, however it should be noted that the estimates used are on the cautious side. We intend to monitor and mitigate as the plan review progresses.

	Year 1 (Start RLDP 2021/22) £	Year 2 2022/23 £	Year 3 2023/24 £	Year 4 2024/25 £	Notes including budgets heads affected
Costs	330,000	250,000	155,000	260,000	Costs include estimated additional staff resource on fixed term contracts which will need to be subject to a business case.
Funded by:					
Revenue Budget	71,600	71,600	71,600	71,600	
LDP Reserve	258,400	178,400	83,400	133,800	
Net Costs	0	0	0	54,600	
(Savings)	(0)	(0)	(0)	(0)	
Net Impact on Budget	0	0	0	54,600	
LDP Reserve (£654,000)	395,600	217,200	133,800	0	

5. Risks

Risk	Impact of Risk if it occurs* (H/M/L)	Probability of risk occurring (H/M/L)	What is the Council doing or what has it done to avoid the risk or reduce its effect	Who is responsible for dealing with the risk?
Not approving content of RR or DA	M	L	The documents have been prepared in line with national regulations and guidance and engagement with relevant stakeholders to influence content.	Planning Policy Manager
Staff Resources and Budget	H	M	There are resources available for this immediate stage of LDP review. Future resource levels will be dealt with as part of the Delivery Agreement process.	Head of RIH/ Development Services Manager

Links to Council Policies and Priorities

The Local Development Plan is one of the statutory plans the Council has to prepare. The current LDP determines Newport's land use policies to 2026. The LDP covers many topics that impact on other sections of the Council e.g. drainage, tourism, education etc. Liaison with those sections is an essential part of the LDP process and this is set out in the Delivery Agreement. A revised LDP will consider any new Council policy, strategy or priority and its impact on the policy framework for the Council and this is explained in the Review Report. Since the LDP's adoption in 2015 there have been a number of significant changes to Council policy which will be of relevance to the LDP, particularly the Well-Being Plan for Newport. Newport City Council has a Corporate Plan that runs to 2022 which is also not referenced in the current adopted LDP. The primary objective of the Corporate Plan is 'improving people's lives' and whilst this is not at odds with the aims of the current LDP, a new LDP will help us to better align the four commitments; Resilient Communities, Thriving Cities, Modernised Council; and Aspirational People within the strategy. As a key document outlining the issues and aspirations of the Council this needs to be reflected in a revised LDP. In addition, there are numerous Council strategies and policies that will influence the LDP e.g. Flood Risk Strategy, Public Rights of Way Improvement Plan, Destination Management Strategy, Economic Growth Plan etc. The RR reports on the implications of these changes since adoption and sets out how it is proposed that the Replacement LDP will help to deliver the aspirations of these plans and strategies.

Options Available and considered

- 1) Approve the responses to the consultation and endorse the updated Review Report and Delivery Agreement.
- 2) Amend the responses to the consultation and endorse the updated Review Report and Delivery Agreement.
- 3) Do not approve the response to the consultation and endorse the updated Review Report and Delivery Agreement.

Preferred Option and Why

- 1) To approve the responses to the consultation and endorse the updated Review Report and Delivery Agreement which has taken into account feedback from public consultation. This option will provide Newport with an opportunity to update the LDP within its new context of legislation, regulations and social, economic and environmental context to ensure it is providing the most appropriate and

ambitious policy framework for Newport. A revised LDP would also ensure the benefits of continuing a strong plan-led approach that provides effective and consistent planning decisions and certainty for investment and minimises undesirable speculative development. The Delivery Agreement clearly sets out the methods and timing of engagement and provides clarity to those interested in the RLDP process of their role and opportunities to inform and influence the outcome of the plan.

Comments of Chief Financial Officer

The Local Development Plan carries a base budget which contributes to a reserve in less active years where no review/cost is required so that there should be sufficient funds to carry out the necessary actions to refresh the LDP when needed. The reserve 'smooths' / funds the cyclically increased costs here and enables the base budget to remain consistent over time.

The financial summary above shows how the LDP will be funded over the course of the review and indicates a shortfall in the final year which would need to be met through existing budget in the Regeneration, Investment and Housing service area. Officers have based the estimated costs on a worst case scenario and the shortfall may not materialise but accept that mitigation from other RIH budget areas will be required if it is the case.

Comments of Monitoring Officer

The proposed action is in accordance with the requirements of the Planning and Compulsory Purchase Act 2004 and the Town and Country Planning (Local Development Plan) (Wales) Regulations 2005 (as amended 2015). The legislation requires the Council to keep under review its Local Development Plan. The legislation and the Regulations require the Council to review the LDP every 4 years. Until now, this has not been necessary as the provisions within the LDP have remained relevant but the current plan is now 6 years old and is in need of revision to reflect legislative changes and the National Planning Framework and to identify new candidate sites for development in the light of increased growth. Cabinet have previously approved the Annual Monitoring Report for submission to Welsh Government, which triggered the commencement of the LDP Review. Cabinet also approved the Review Report (RR) and Delivery Agreement (DA) for public consultation between January and March. The report sets out the consultation responses and some minor amendments to the documents to reflect that feedback. Cabinet are now required to approved the revised RR and DA and recommend that that are approved and adopted by full Council, in its capacity as Local Planning Authority, in May. The RR and DaA will then be submitted to Welsh Government and their agreement to the DA will then trigger the commencement of the LDP revision process. The revised LDP will also be a policy framework document that will need to be approved and adopted by full Council in due course.

Comments of Head of People and Business Change

Approval of the Review Report and Delivery Agreement are the next stages in the LDP review process.

In the cover report, the report writer has detailed how the LDP meets the five ways of working of the sustainable development principle contained in the Well-being of Future Generations (Wales) Act 2015.

The Delivery Agreement sets out the proposed staff resource for delivering the revised LDP. It is noted that a dedicated LDP budget is in place to fund the additional resource required.

Comments of Cabinet Member

The Cabinet Member for Sustainable Development has been briefed on the draft documents.

Local issues

The LDP will affect all wards in Newport.

Scrutiny Committees

None

Equalities Impact Assessment and the Equalities Act 2010

The Equality Act 2010 contains a Public Sector Equality Duty which came into force on 06 April 2011. The Act identifies a number of 'protected characteristics', namely age; disability; gender reassignment; pregnancy and maternity; race; religion or belief; sex; sexual orientation; marriage and civil partnership. The new single duty aims to integrate consideration of equality and good relations into the regular business of public authorities. Compliance with the duty is a legal obligation and is intended to result in better informed decision-making and policy development and services that are more effective for users. In exercising its functions, the Council must have due regard to the need to: eliminate unlawful discrimination, harassment, victimisation and other conduct that is prohibited by the Act; advance equality of opportunity between persons who share a protected characteristic and those who do not; and foster good relations between persons who share a protected characteristic and those who do not. The Act is not overly prescriptive about the approach a public authority should take to ensure due regard, although it does set out that due regard to advancing equality involves: removing or minimising disadvantages suffered by people due to their protected characteristics; taking steps to meet the needs of people from protected groups where these differ from the need of other people; and encouraging people from protected groups to participate in public life or in other activities where their participation is disproportionately low. The replacement LDP process and in particular the CIS of the Delivery Agreement sets out an engagement approach which takes into account how to engage with stakeholders including hard to reach groups and apply techniques that make engagement appropriate for stakeholders e.g. plain English and non-technical versions of reports, documentation provided in Welsh, large print versions provided on request. In addition the RLDP process will undertake an Integrated Sustainability Appraisal process that shall include an equalities impact assessment to ensure the RLDP is developed in line with these requirements.

Children and Families (Wales) Measure

The Delivery Agreement sets out the need for targeted consultation and this includes engagement with children and young people, consultations on such documentation is open to all of our citizens regardless of their age. People replying to consultations are not required to provide their age or any other personal data, and therefore this data is not held or recorded in any way, and responses are not separated out by age.

Wellbeing of Future Generations (Wales) Act 2015

The Well-being and Future Generations (Wales) Act seeks to improve the social, economic environmental and cultural well-being of Wales. Public bodies should ensure that decisions take into account the impact they could have on people living in Wales, in the future. It should be noted that the planning system is central to achieving sustainable development and the five ways of working are an intrinsic part of the planning system. A plan-led approach is viewed as the most effective way to secure sustainable development. The 5 main considerations are set out below with an explanation of how this work meets their objective:

- Long term: An LDP sets out a vision for how places are expected to change in land use-terms and this provides certainty for developers and the public. The monitoring and review process of the LDP provides an opportunity to look back on what has worked and take the time to update the plan to take a look at what Newport will need to plan for over the next 15 years.
- Prevention: The aim of the LDP and indeed planning is to create sustainable places. This approach will look to tackle issues such as safety, flood risk, health, air quality, amenity, availability of jobs, energy efficiency and carbon reduction, opportunities for skills and education as well as the protection of cultural facets. All options that will help create spaces which prevent negative impacts on health and wellbeing, environmental and economic factors.
- Integration: The LDP will have regard to the local well-being plan and other relevant corporate strategies and policies. The review process will take into account those council policies and strategies that have been created since the adoption of the LDP in 2015. The influence of the LDP covers many service areas as well as external organisations and these stakeholders will play an important role in the development of the plan.

Collaboration: The LDP has to consider its impact on its neighbouring authorities and there is much work being done within the region which will provide part of the evidence base and influence the policy outcomes for Newport e.g. flood risk impact from the catchment. We will also work with a range of other partners to ensure that we are working together effectively on shared ambitions and aspirations. The LDP review process has to investigate and consider joint approaches to creating an LDP and this will be reported.

Involvement: A key aspect of the LDP process is engagement. The adoption and adherence to the Delivery Agreement and the Community Involvement Scheme is a key element of the process. This approach provides a clear timescale and approach for effective and efficient engagement.

This proposal is in line with the Council's well-being objectives published in May 2018. The RLDP will consider the objectives of the Well-Being Plan for Newport and seek to deliver what it can to meet the four well-being objectives for Newport. There are clear links between the RLDP and delivering on the Newport offer, creating strong and resilient communities and developing the right skills, providing green and safe spaces as well as making sure there is push towards sustainable travel.

Crime and Disorder Act 1998

Section 17(1) of the Crime and Disorder Act 1998 imposes a duty on the Local Authority to exercise its various functions with due regard to the likely effect of the exercise of those functions on, and the need to do all that it reasonably can to prevent, crime and disorder in its area. It is considered that there would be no significant or unacceptable increase in crime and disorder as a result of the review of the LDP. One of the objectives will be to ensure that places are secure and safe.

Consultation

The draft Review Report and draft Delivery Agreement were subject to a minimum of 8 weeks consultation started in January 2021 and concluded in March 2021. The comments received and a response to each of these is set out in Appendix A & B of this report.

Background Papers

Post Consultation Delivery Agreement & Review Report

LDP – Draft Review Report & Draft Delivery Agreement Consultation Forms



FINAL RR
CONSULTATION FOF



FINAL DA
CONSULTATION FOF

LDP – Draft Review Report & Draft Delivery Agreement



Draft Review
Report 23NOV20.do



Draft Delivery
Agreement 24NOV21

[Local Development Plan Manual Welsh Government 2020](#)

APPENDIX A- CONSULTATION COMMENTS AND RECOMMENDED RESPONSES – REVIEW REPORT

Draft Review Report Consultation January -March 2021 Comments Received and recommended Council Responses

Respondent	Comment	Recommended Council Response
<p>Glamorgan Gwent Archaeological Trust 00063</p>	<p>Thank you for consulting us on these documents. We note that there is provision for the protection and enhancement of the historic environment, including the archaeological resource. We welcome this.</p> <p>As we have noted previously, the historic environment resource in the Newport area is important and is formed both of statutorily designated historic assets (areas and structures), and a wide range of non-designated historic assets. The range of these includes the Registered Landscape of the Gwent Levels, as well as information on discrete finds of all periods, from the prehistoric through to post-medieval, all of which contribute to the distinctive heritage and current form of the area. These should not be seen as any constraint to development, but viewed with the Well-being of Future Generations (Wales) Act, contribute substantially to the well-being goals relating to culture and community, and by understanding and enhancement to the remaining goals.</p> <p>The Draft Review Report notes the varied area of Newport, shaped by human activity as well as natural processes over millennia; it references current legislation and Policy relating to the Historic Environment: the Historic Environment (Wales) Act 2016; Planning Policy Wales (2018, chapter 6) and TAN24: The Historic Environment. There are Objectives and Policies in place to protect and enhance the historic environment; and we note that Strategic Objectives 5 and 8 specifically include the historic environment and cultural heritage. The historic environment is included via the extant legislation and policies, and the local plan objectives and policies, so that enhancement and protection is given, particularly to the non-designated assets that give a sense of place and value to the historic environment. The documents note amongst all aspects of the plan that the historic environment needs to be managed sustainably, and that it appears to be doing so.</p>	<p>Support noted</p> <p>The value of the historic environment in Newport is understood and the replacement LDP will look to provide an adequate and appropriate policy framework for its protection and the opportunities related to its broad values.</p> <p>Policy for the preservation and enhancement of the historic environment is set at all scales of planning policy. The RLDP will play its part in reflecting, not duplicating this, and ensure it reviews and updates the local policy framework as required following analysis and consultation.</p>
<p>Tin Shed Theatre</p>	<p>Here at Tin Shed Theatre Co we have for some time been working alongside city centre organisations such as Newport City Homes, Newport Live, Friars Walk, Newport Library</p>	<p>The engagement of organisations such as the Tin Shed Theatre Company is something that</p>

Respondent	Comment	Recommended Council Response
<p>Company 00313</p>	<p>and Museum services in order to begin building a picture of lack of social infrastructure alongside proposals of utilising empty space and the re-shaping of how better to use open public space.</p> <p>Through our continued research and consultation, alongside the understanding that retail alone will not encourage footfall into the city centre, we would like to open a proposed discussion to allow sociological and creative conversation for the redevelopment of public land.</p> <p>It has been proven through similar projects such as The Empty Shops project, independent business initiatives, peppercorn rent schemes and other such initiatives across Europe that, by allowing creative visualisation of empty/negative space and developing a better understanding of our changing sociological and consumer behaviours as a result of austerity and now a global pandemic, our initial roles as heads of organisations with the ability to affect social change from local authorities level should be to increase social infrastructure, promote health and wellbeing and foster a better, more positive connection to our city and the people around us. A holistic view that is supported at Local Authority Level, utilising the incredible talent to visualise the use of space from the cities creative thinkers.</p> <p>I would, therefore, like to open a discussion between our current proposed plans and research to connect with city planning and redevelopment moving forwards.</p>	<p>we would welcome. Initial dialogue has occurred, but this will need to continue as part of the development of the RLDP.</p> <p>The collation of research and evidence to assist our policy development is welcomed and examples of good practice is always greatly received.</p> <p>Placemaking is a fundamental part of the planning system that is reiterated at national to local scale policy development and outputs. The recent publication of Future Wales: the national plan 2040 and Planning Policy Wales strengthens the need to continue to focus on the importance of the City Centre but to consider a mixed use and high density approach in this accessible location. The RLDP will need to consider the vision and appropriate policy framework to achieve regeneration goals for the City Centre.</p>
<p>A Hussain 00317</p>	<p>Thank you for allowing me to comment on the review of Newport's LDP 2011 to 2026. As a long-term resident in Cardiff and working in Newport, I would like to make some key points for the new LDP.</p> <p>In light of the recent pandemic and the local to national lockdowns and the possibility that such lockdowns may still recur in the future, it is proving more important to sustain our local green spaces and miniature nature reserves and wildlife. This is so local residents can enjoy their local areas for our mental and physical wellbeing.</p> <p>Therefore, I would suggest that brownfield sites should be redeveloped first taking priority over building on green field sites. In particular, I am concerned with the massive business park planned next to Hendre lake which would concrete over a large section of</p>	<p>The holistic benefits of greenspaces and wildlife has been reflected in the current LDP and will form a key issue for the RLDP as highlighted in the Review Report.</p> <p>A focus on brownfield development is a requirement of national policy. However, the availability and supply of brownfield sites is not yet quantified. The assessments to quantify this need will look at the availability of empty properties. There may be a requirement to identify greenfield sites, of which there were</p>

Respondent	Comment	Recommended Council Response
	<p>the existing farmland with the extensive biodiversity that is already present. As many buildings currently stand empty within Cardiff, it does not make sense to build more empty buildings.</p> <p>However, I cycle to work several days in the year and I support non car commute. But on days, when the weather is harsher or icy, cycling is hazardous. As such, I can understand that other methods of transport need to be in place and rail is a much quicker mode of transport and greener. I would support the building of commuter train stations in East Cardiff. I would prefer that all train stations are built from public funds rather than relying on private initiatives that would seek to destroy much needed green spaces.</p> <p>As Cardiff is already a very low-lying city, the risk of flooding is increasing yearly with recent storms in the past few years demonstrating the threat to homes and businesses. Maintaining the reens and the gwent levels will ensure the risks of flooding in East Cardiff remain low. Developing on these greenfield sites will increase water run off to the reens and overwhelm them at a time when they are already full.</p> <p>Our first minister, on the basis of environmental concerns, ceased the construction of M4 relief road through the Wentlooge levels. I would therefore assume that no further developments will be allowed on this SSSI land which is so unique to our area. I also hope all 'Protect and Enhance' countryside land will be protected and I would hope further expanded in the LDP recognizing the need for this key habitat and green space.</p>	<p>some in the current LDP. The protection of wildlife and agricultural value of land is all part of the consideration of designating land for development.</p> <p>The delivery of private facilities, such as train stations, is not something a LDP can control. If such public transport is made available, then we are tasked to understand and maximise the opportunities gained from such developments.</p> <p>As part of the development of a RLDP a Strategic Flood Risk Assessment will be undertaken for RLDP designations and the impact on flood risk and drainage will be considered.</p> <p>It is not considered appropriate to provide a policy that results in the total ban of development on the Gwent Levels. The importance of the Gwent Levels and its many designations i.e. SSSI, Internally Important Historic Landscape, Special Landscape Area etc are all considerations when considering where to located development. For example, the importance of allowing rural forms of development is to be considered, so too the setting of the urban boundary where development outside this boundary would need to be appropriate in the countryside. The value of this landscape is well understood and the RLDP will consider any proposed development in line with this understanding.</p>

Respondent	Comment	Recommended Council Response
<p>Future Generations Commissioner for Wales 00092</p>	<p>...Planning is one of the priority areas, which the Future Generations Commissioner has selected for our office and we have published a number of resources and tools to help you and your team ensure that the revised Local Development plan aligns with the Well-being of Future Generations Act and helps contribute to the seven well-being goals and your own well-being objectives.</p> <p>In May 2020, we published the first Future Generations Report, which sets out the Commissioner's assessment of where Wales is at the moment, a vision for the future and recommendations to help public bodies reach that vision. This includes a section on Planning and Placemaking, which contains a number of recommendations relevant to this exercise, including recommendations to:</p> <ul style="list-style-type: none"> • Align Local Development Plans and well-being plans/well-being objectives. • Make use of the advice and review service of the Design Commission and of the Welsh Health Impact Assessment Unit for major development and design and revisions of Local Development Plans. • Change mindsets from consultation to involvement and make every effort to involve people in plan design. • Synchronise and align all their infrastructure plans. • Produce plain language explanation of their Local Development Plans and their planning documents and guidance. • Embracing the new presumption in Planning Policy Wales 10 paragraph 1.17 in favour of sustainable development in accordance with the development plan to ensure that social, economic, cultural and environmental issues are balanced and integrated. <p>A bite-sized version of this chapter would have been sent to your team by Welsh Local Government Association or the Planning Officer Society and is available on our website here.</p> <p>I would also suggest having a look at the self-reflection feedback we sent you in 2019 as it contains advice about placemaking, future-fit housing and decarbonisation, which is relevant to this work.</p> <p>There are also a number of other resources that could help you ensure that the Well-being of Future Generations Act and its elements are embedded in your work:</p> <ul style="list-style-type: none"> • Our framework for scrutiny as it can help you ensure that this work considers all of the Act's elements - goals, objectives and ways of working. 	<p>We welcome the support and identification of the value of development plans to the delivery of the Welsh Well-being goals. The information and resources noted are appreciated and we look forward to working with the Commissioner and her team in the development of the RLDP.</p>

Respondent	Comment	Recommended Council Response
	<ul style="list-style-type: none"> • The Journeys to the well-being goals on our website as they might give you some inspiration and ideas about the actions you can take to contribute to each of the goals. We have also produced a Journey on Involvement, which will be useful for your consultation and wider involvement exercise. • It is very important that your Local Development Plan does not only address current needs but also considers future trends. We have published a 3 Horizons Toolkit together with Public Health Wales to help public bodies to think and plan for the long-term by keeping a clear vision and taking future trends into account. <p>Finally, I would suggest looking at other useful planning and placemaking resources, such as the Design Commission's Placemaking Charter and guidance, RTPI's Value of Planning tool, and the Creating Healthier Places guide by Public Health Wales and Natural Resources Wales.</p>	
The Coal Authority 00324	We hold no records of past coal mining legacy features at surface or shallow depth in the Newport City Council area. On this basis we have no specific comments to make in respect of the Local Development Plan consultation.	Noted
Mr Anstey 00207	<p>As discussed I would like to make the following observation for inclusion in the new LDP. Under the current LDP I have been unable to gain planning permission for the conversion of a 40 year old agricultural barn into Holiday accommodation as there currently isn't a specific mention of it under your tourism strategy. Other local authorities are little more progressive such as Monmouthshire where this is encouraged. Surprising as there is a requirement for even more tourism opportunities linked to the Celtic Manor etc. I would think a specific policy mention in the replacement LDP would be helpful.</p> <p>I imagine that the prerequisite would be that the building would need to demonstrate that its capable of conversion and that it is more than 30 years old. Agricultural buildings could be more modern in type such as steel beam frame and sheet/wood clad rather than stone built. This would in fact encourage the retention of older pre and post war Dutch Steel frame farm buildings which are a historic part of our landscape that are now being lost through lack of maintenance.</p> <p>I also would like the Council to look at encouraging the retention of historic steel frame curved roofed Dutch barns for conversion into dwellings where they are already in the</p>	The review report noted that the tourism policy was in need of review and your comments will be noted as part of that specific work.

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	curtilage of other residential buildings. Such conversions are being allowed in England and there are some great architectural design examples	
Dwr Cymru 00013	We have no specific comments to make but look forward to engaging with you through the Replacement LDP process.	Noted we look forward to working with Dwr Cymru as part of the RLDP.
Marshfield CC 00022	<p>Marshfield Community Council would like to make the following observations to be taken into account when the Local Development Plan for Newport is reviewed.</p> <p><u>LDP (Local Development Plan) – Response from MCC</u></p> <p>The revised LDP shows no evidence of any significant redevelopment or specific changes to occur in Marshfield and Castleton. However, we would like to firstly draw your attention to the following unmet key points that were in the original and revised LDP. Since there are no specifics under the various areas we would request that you would comment specifically on how you wish to achieve these.</p> <p><u>Transport</u></p> <p>The regular bus service, rather than being improved, was removed and replaced with a DRT Service.</p> <p>This has had the negative affect on the LDP as follows:-</p> <ul style="list-style-type: none"> * Skills access * Quality of life * Less sustainable forms of travel being used * No reduction in noise levels * No improvement in air quality <p><u>Flood Risk</u></p> <p>We would like to know what further preventative measures are going to be put in place. To date, these are insufficient as seen with flooding in December 2020, January 2021 and in earlier years.</p> <p>Specifically, there is room for improvement in:-</p> <ol style="list-style-type: none"> a) The regular maintenance and management of the drainage systems ditches and Reen system in the Marshfield area and generally in the whole of the Wentlooge (Gwent) Levels, currently the responsibility of the failing NRW to prevent flooding. b) Prevention of surface water on the road and flooding of land immediately next to the roads e.g. Church Lane, St. Mellons Road, Marshfield Road near the allotment, Acorn Place, Groes Corner, Hawse Lane, Ty Mawr Road. <p>Many of these roads are the main road network in and out of Marshfield. Therefore, when flooded Marshfield is left closed off from other areas preventing transport in and out until the flood level depletes.</p>	<p>Noted</p> <p>The consultation documents were not a replacement plan but a review of the current plan and identification of changes since the adoption of the LDP that will need to be taken into account in a revision.</p> <p>The comments provided in terms of policy topics i.e. Transport, Flood risk, facilities, accessibility and parking will all be covered in a policy review. There will be opportunities for engagement and feedback on the proposed policy amendment and additions. There shall also be village assessment work undertaken which shall allow feedback on local issues such as those highlighted in this response. The Review Report doesn't mention this part of the evidence base and it is consider necessary for it to be included.</p> <p><i>AMENDMENT: Paragraph 5.2.12 will be updated to include reference to Village Assessment as a required element of the updated evidence base.</i></p> <p>In addition, a Strategic Flood Risk Assessment will be undertaken for RLDP designations and the impact on all types of flood risk, including surface water, and drainage will be considered.</p>

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	<p>c) In the case of an emergency, communication to residents, pedestrians and motorists warning of flood waters. There are no emergency supplies of sand bags for residents either, or communication of where they can be obtained. In December residents were diverted from one agency to another in order to get help. When flooded, communication lines are the first to go down, so this is of paramount importance.</p> <p><u>Road Maintenance</u> The quantity of potholes in Church Lane leaves more pot holes than actual road surface. This is on a road which is the main access to the parish church for pedestrians, cyclists and motorists. The church is obviously used for various events. This is particularly bad when the potholes are also filled with flood water and especially dangerous at night time. This has been reported for years and the potholes poorly filled instead of resurfacing. We would like to see a programme of maintenance to bring back the roads to a good standard to achieve their intended purpose.</p> <p><u>Street Scene</u> No regular maintenance plan to improve street signage when they become unreadable. In some cases this causes a major issue for motorists who have to slow down to read the sign, thus causing an obstruction.</p> <p><u>Facilities</u> When completing the online consultation form it requests a “yes” or “no” for most facilities. There is no room for “not applicable”. The extent, of the lack of facilities that Marshfield and Castleton experience is of concern to our residents. Specific forward planning is required by NCC to enable space to be made for some of these services to be restored, particularly as Marshfield has expanded over the years and is seen as a Village but has the population of a town. We have one shop only in Marshfield which is a small shop selling basics/post office/chemist all in one. In Castleton there is only a service station which includes a shop selling basics.</p> <p>Missing facilities include:-</p> <ul style="list-style-type: none"> *Doctors Surgery *Dentist Surgery *Other Retail Shops *Coffee Shops *Library *Parking. There is limited parking for the local shop and for Marshfield Primary School, both have double yellow lines close by them preventing parking for safety reasons. 	<p>It should be noted that the issues raised on road maintenance, street scene and illegal parking matters are not a consideration for the development plan and these issues should be raised directly with the City Services section of the Council.</p>

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	<p>- The lack of alternative parking however causes many to park illegally causing a hazard to pedestrians (particularly young children) and passing motorists and this is not dealt with adequately.</p> <p>*Public Toilets – The lack of facilities on the A48 results in the Lych-gate to the Cemetery being used as a urinal.</p> <p>All of these essential facilities have to be sourced in other areas of Newport and Cardiff which require good access to public transport which Marshfield doesn't have.</p> <p><u>Accessibility</u></p> <p>No road crossings on the A48 in Castleton suitable for the elderly/ less able/some pram and pushchair users.</p> <p>The existing pedestrian bridge is good but not suitable for all.</p> <p>Footpaths have no ongoing programme of maintenance and we have had repeatedly request these are maintained for normal use.</p> <p>No traffic calming measures have been put in place on the A48, despite numerous requests to all authorities where pedestrians, especially the elderly, frail and disabled need to cross the road to access bus services into Newport and Cardiff. Pupils need to cross the road to catch a school bus, and Students need to use the bus service to college. The speed limit is 50mph through numerous junctions. However, traffic travels at speeds well in excess of this, through an area with two main junctions and many other roads adjoining it either side, which are considered in traffic management terms as potential hazards. The following are a summary of motorist journeys. In this short length of carriageway there are in excess of 30 possible journeys that can occur on the A48 at Castleton, which at peak times in particular make these junctions dangerous as follows:-</p> <p>Traffic to and from the Nursing Home from Cardiff and Newport and Marshfield Road and Coal Pit Lane</p> <p>Traffic to and from the Premier Inn and Coach and Horses from Cardiff and Newport, Marshfield Road and Coal Pit Lane</p> <p>Traffic to and from Coal Pit Lane from Marshfield Road, the Service Station, Channel View, Craig y Haul, Newport and Cardiff</p> <p>Traffic to and from Marshfield Road from Coal Pit Lane, the Service Station, Channel View, Craig y Haul, Cardiff and Newport</p> <p>Traffic to and from Channel View to Newport, Marshfield Road, the Service Station, Craig y Haul, Cardiff</p> <p>Traffic to and from Craig- y – Haul from Cardiff, Channel View, the Service Station, Coal Pit Lane, Marshfield Road, Newport</p>	

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	<p>Traffic to and from the Service Station from Marshfield Road, Coal Pit Lane, Craig y Haul, Cardiff and Newport Traffic from Cardiff returning back to Cardiff Other residential driveways adjoining the A48. This most certainly would benefit from traffic management which is notably provided in less populated areas of Newport that have less junctions and less potential for accidents. The wellbeing of future generations should apply here. Waiting for more accidents and fatalities on this stretch of road before action is taken is abhorrent to the majority of road users and pedestrians. The cost of one fatality in a road traffic accident is in the region of £1.69 million!</p> <p><u>Illegal Parking Safety issues</u> Parking on double yellow lines continues outside Marshfield Primary School, causing a danger to pedestrians (particularly children) and passing motorists and needs to be dealt with more quickly and severely.</p> <p>Secondly we would like to propose the following are added to your proposals as part of your planning framework for development and use of land in Newport:-</p> <ol style="list-style-type: none"> 1) Provide enhanced legal protection/designation like an ANOB for The Wentlooge (Gwent) Levels SSSI and special landscape areas and heritage landscapes ensuring that they are safe and protected from continued pressure for development and preserved for future generations. 2) Prohibit the granting of planning consent for new builds in areas where the community has been categorised as "unsustainable". This would affect local infrastructure e.g. roads and drainage and possibly amenities for which very little space is available. 3) The green wedge west of Newport to the Cardiff border is in need of protection from new housing development especially connected with the proposed new train station at St. Mellons. (Bellway Homes has either purchased or paid a retainer on land west of Marshfield on St Mellons Road). 4) Any new developments should be on Brownfield Sites but only with due consideration for the unique environment around them. 5) Arterial routes/lanes into and out of Marshfield should be protected from illegal development 'creep' of industrial sites. 	<ol style="list-style-type: none"> 1) The designation of the levels as a SSSI, internationally recognised landscape of historic interest etc are designations made outside of the local authority. As part of the RLDP work we will be considering allocations such as Green Wedges, SLA etc. It is understood that the designation of an area for ANOB status lies with government in this case Natural Resources Wales. The RLDP would only reflect this designation if it were to be made by NRW. 2) The planning policy framework in Wales is set so the system supports sustainable development. There are many issues to consider when looking at the merits of development. The allocation of the urban boundary/ village boundary is key to setting out where development is considered

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		<p>sustainable. There are always specific matters e.g. development that supports the rural economy, tourism etc that will need to be considered outside of the settlement boundaries. There will be an opportunity through the RLDP development to comment on the settlement boundaries and policies that allow development in the countryside.</p> <p>3) There is a Green Belt to the west of Marshfield. This designation goes beyond the plan period. The RLDP will consider if any slight amendments are required but there are no plans to remove the Green Belt.</p> <p>4) A focus on brownfield development is a requirement of national policy. However, the available and supply of brownfield sites is not yet quantified, the assessment work for such quantification of need will look at the availability of empty properties. There may be a requirement to identify greenfield sites, of which there were some in the current LDP.</p> <p>5) The requirement for industrial units in the area will be considered as part of the plan but it should be noted that rural enterprises are supported by national planning policy as long as they are able to satisfy detailed policy requirements e.g. impact on flood risk, amenity, highway safety etc.</p>
Campaign for Real Ale 00078	I think we can be reasonably satisfied that social amenities like pubs have some level of protection in the LDP, enough so that we could quote their own words should we need to.	The review highlighted the need to revise the community facility policy. The need for protection of community facilities is supported but the effectiveness of the policy has been queried. There will be opportunities to

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E A Yearsley 00323	<p>The key to the review of this LDP is to provide for a post-Covid social/economic recovery to counter the effects of the Coronavirus Pandemic.</p> <p>The Planning System has an important role to play in this respect by reinvestigating employment/business sites in a bid to provide additional opportunities for work/skills training and also to reappraise the numbers of affordable housing units proposed in terms of social inclusion.</p> <p>The timing of this is opportune in that the National Development Framework, (now known as 'Future Wales') has identified Newport as an area of regional growth and investment. As stated in the report this is a significant boost for the City and monies put forward, together with a share of monies set aside by the Chancellor in the Spring 2021 Budget, will go a long way in regenerating the area and giving Newport its rightful status as the second largest City in Wales.</p> <p>One of the first assessments to be made is that of the siting of Newport on the banks of the Severn Estuary, with reference to the Wales National Marine Plan WNMP adopted Nov 2019. Both Cardiff and Swansea have been successfully regenerated to maximise their marine locations. Similar Marine developments should be attracted and encouraged to the area to take full advantage of the City's location on the estuary.</p> <p>'Wales Transport Strategy – A Vision for Transport in Wales' Nov 2020, because of its timing, should have an intensive impact on the replacement LDP. Collaboration is the way forward in this respect as the South East Wales Transport Commission recommends (in the wake of the decision not to proceed with the M4 relief Road), major improvements to public transport in the South Eastern region of Wales. 4 new stations are being proposed to compliment the existing Cardiff Central, Newport and Severn Tunnel Junction.</p> <p>These are to be located at Newport Road Cardiff, St Mellons (Parkway), Newport West and Newport East (Somerton/ Llanwern/ Magor). Transport hubs attract development and should therefore be thoroughly investigated in terms of the opportunities (relating to employment, business, housing and leisure facilities. Existing settlements/communities would also benefit from the new opportunities that public</p>	<p>comment on policy revision as part of the process.</p> <p>The impact of Covid-19 will be a consideration in the review of the LDP, in particular taking a view on what we have learnt from the pandemic as well as what needs to be done to aid recovery. The identification of Newport as a centre of national growth in Future Wales is welcomed.</p> <p>The importance of the City's location bisected by the River Usk and along the Severn Estuary is part of the current vision of the plan. The benefits of this location have been reflected in the past with the introduction of the waterfront development policy, however that is not to say that there aren't more opportunities to consider. A note on the need to consider if there is anything further these polices can consider and indeed the importance of these policies will be noted in the policy review section of the Review Report. We would encourage projects to enable this to be provided at the Call for Candidate Sites in June this year. The development of the plans vision, objectives and indeed policies will be available for comment and you are encouraged to provide comment at those stages.</p> <p>AMENDMENT, Page 44 Add a column above CE4 call Heritage. In commentary box add: Review the need to update in line with new legislation and link with the Newport Offer.</p>

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	<p>transport offers eg the Community of Marshfield would be just 10 minutes away from the St Mellons (Parkway) Station, offering employment opportunities in both Cardiff, Newport and also Bristol and suggesting the area could sustain further development making this a more attractive/viable place to live.</p> <p>The review makes reference to the need for more specific investigation into Community facilities ref Policy rev 4.23. This is a matter that the Pandemic has also highlighted. Many communities including small existing and new developments have no associated facilities eg local shop/PO, requiring locals to have to make unnecessary car journeys. This should be fully considered when determining planning applications, and where necessary land set aside for associated facilities. This would then be in line with the 'concept of place making' as set out in the 'Well being of Future Generations Act'.</p> <p>The review discusses Tourism and admits that 'very little is made of tourism'. When you consider the wealth of history relating to this area of South Wales eg the Chartists, the Mining industry, the Docks and the Transporter Bridge, not to mention the Art College and the Cathedral, this is particularly disappointing and an area where more thought and investment could be injected. For example a golden opportunity was missed when Newport gained City status. St Woolos Cathedral holds a commanding position at the top of Stow Hill. This would be one landmark that visitors to the area would wish to visit: (and having pedestrianised/cobbled the street outside the row of shops, allowing the traffic to flow around the other side of the Cathedral, would give the area a 'sense of place' within the public realm; where tourists could stay a while and enjoy the facilities on offer. Vittorio's an age old family business could spill out on to the pavement with tables and chairs creating a 'café culture'.</p> <p>The risk of flooding is becoming evermore commonplace throughout the region with our changing climate. This is an area where policy revision needs to be further considered with the emphasis on much more collaboration and consultation with the necessary bodies when determining planning applications. When dealing with applications for housing developments on a flood plain or near a watercourse perhaps the answer is to reduce densities. Similarly when dealing with surface water flooding on highways, collaboration with all necessary bodies such as highway drainage, NRW should be</p>	<p>There have been very recent publications on proposals for transport across Wales and in the South East Region. This has been reflected in future Wales and Newport will be tasked to take advantage of the opportunities made from the implementation of improved public transport schemes including the South East Wales Metro.</p> <p>The review of community facility policies, Section 106 requirements, access to facilities etc. will all be covered in a policy review. There will be opportunities for engagement and feedback on the proposed policy amendments or additions. There shall also be village assessment work will also allow feedback on local issues such as those highlighted in this response.</p> <p>The review report noted that the tourism policy was in need of review and we would welcome your engagement and feedback on the development of such topics at the relevant stage of the RLDP process.</p> <p>As part of the development of a RLDP a Strategic Flood Risk Assessment will be undertaken for RLDP designations and the impact on flood risk and drainage will be considered.</p>

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	<p>undertaken to look at the problem holistically rather than just find a quick fix, temporary measure.</p> <p>We are at an important juncture coming out of the Pandemic and as stated the replacement LDP is the tool to drive our recovery and create opportunity and a better built and natural environment. The above mentioned issues are considered to be worthy of much more consideration and collaboration with the relevant bodies.</p>	<p>We welcome the reflection of the important role that the RLDP will play in the future recovery and delivery of identified needs for the City Borough and this shall be a consideration in the review of the LDP.</p>
<p>Mineral Products Association 00060</p>	<p>The Mineral Products Association (MPA) is the trade association for the aggregates, asphalt, cement, concrete, dimension stone, lime, mortar and silica sand industries. With the affiliation of British Precast, the British Association of Reinforcement (BAR), Eurobitume, MPA Northern Ireland, MPA Scotland and the British Calcium Carbonate Federation, it has a growing membership of over 530 companies and is the sectoral voice for mineral products. MPA membership is made up of the vast majority of independent SME quarrying companies throughout the UK, as well as the 9 major international and global companies. It covers 100% of UK cement production, 90% of GB aggregates production, 95% of asphalt and over 70% of ready-mixed concrete and precast concrete production. In 2016, the industry supplied £18 billion worth of materials and services to the Economy. It is the largest supplier to the construction industry, which had annual output valued at £169 billion in 2018. Industry production represents the largest materials flow in the UK economy and is also one of the largest manufacturing sectors. For more information visit: www.mineralproducts.org.</p> <p>With respect to the above consultation, it is worth noting that for a number of days the consultation documents were not accessible due to the Council's website not being available. The Council may wish to extend the period of consultation to take this in to consideration. We were however, grateful the Council managed to forward hard copies for our perusal.</p> <p>We have the following comments to make.</p> <p>Chapter 3. Informing the LDP Review We feel this chapter benefit being updated to reflect that the National Development Framework, known as "Future Wales: the national plan 2040" has now been adopted.</p>	<p>Noted</p> <p>We apologies for any technical difficulties. The consultation period was two weeks longer than that specified as best practice, so it was not considered necessary to extend the consultation period this time. It is also noted that there were no requests for an extension of time to supply comments were received by the Council.</p> <p>The chapter will be updated to reflect the recent adoption of Future Wales and Planning Policy Wales.</p>

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	<p>This has also been accompanied by revisions to Planning Policy Wales and as such the Draft Review Report (DRR) should refer to PPW Edition 11.</p> <p>This chapter has, however, overlooked critical matters relating to minerals, including the Regional Technical Statement (RTS) 2nd Review and the accompanying South Wales Annex, and the respective Mineral Technical Advice Notes (MTANS). This is surprising in that the AMR 2020 mentions the 2nd Review of the RTS as does paragraph 5.3.29 of the DRR, confirming it will form part of the evidence base. The RTS and MTANS are important foundation documents for inclusion in the RLDP review.</p> <p>Paragraph 4.23 of the DRR identifies areas of Policy Revisions, including Minerals Safeguarding. We support this noting that the AMR highlights that over 30% of applications within Minerals Safeguarding Areas did not consider the issue of mineral sterilisation in the officer's report. Previous AMR's highlight this as a longstanding issue, the resolution to which, is identified as "training". We would be happy to work with the Council in supporting a mineral training programme for the Council's officers.</p> <p>Paragraph 5.3.29 recognises that the RTS (2nd Review) has been progressing. A number of Local Planning Authorities have endorsed the RTS, although it is unclear if Newport is one of those authorities. We urge the Council to expedite endorsement and that trust once endorsement has taken place, the requirements of the RTS will be embedded in the minerals policies within the reviewed plan. Further, the wording of the DRR indicates that the future LDP policy revision should consider if the policy wording is "appropriate(ly) and workable". We suggest this should go further to ensure the requirements of the policy should also be "deliverable".</p> <p>Chapter 6 of the DRR indicates the "Future evidence base" which may be required for the LDP. We recognise that this list is not exclusive, but would suggest inclusion of the Aggregate Monitoring Survey 2019, currently being carried out by the British Geological Survey, on behalf of MHCLG and WG, and also the Annual Minerals Survey report, carried out and produced on behalf of the SWRAWP.</p>	<p>AMENDMENT: Update paragraphs 3.11&12 to reflect the recent change to national planning policy.</p> <p>The RTS is a requirement of PPW and therefore has been noted in the relevant section of the Review Report as a part of the evidence base. The importance of the RTS is not questioned and it is recognised as an important part of the RLDP evidence base.</p> <p>It is agreed that MTANS have not been noted in the report and para 3.15, 5.3.29 and the glossary which refers to TANS should be updated to note this.</p> <p>AMENDMENT: Paragraph 3.15 and 5.3.29 and Glossary to be updated to include reference to MTANS.</p> <p>The offer of training is appreciated. We shall make contact to discuss this matter.</p> <p>The endorsement of the RTS is being progressed by the Council. We note the suggested alteration to the policy text and shall take this into account when reviewing the mineral policy section.</p> <p>Agree to add to the list: Aggregate Monitoring Surveys AMENDMENT: Add Aggregate Monitoring Surveys to Chapter 6.</p>
NRW 00004	We have reviewed your Review Report and Delivery Agreement and have no comments to make on the reports in terms of our role as a statutory planning advisor.	Noted we look forward to working with NRW as part of the RLDP.

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<p>The friends of The Gwent Levels 00322</p>	<p>The Friends of Gwent Levels is a grassroots campaigning group with a mission to protect the Gwent Levels from neglect and damaging development. We want to restore biodiversity and maintain the visual and historical integrity of the landscape.</p> <p>Our response to the review of the 2015 Local Development Plan is based upon the threat of growing demands for development in the Gwent Levels and, in particular, multiple applications for the installation of renewable energy schemes. Our concerns arise from the serious limitations of the current designations, legislation and policy protections for biodiversity and species that currently reside on the Levels. It is our experience that planning applications for schemes with significant predicted impacts on the biodiversity and rare / protected species at the located site are being submitted for planning approval with prior consultation from the local authorities.</p> <p>Friends of the Gwent Levels are campaigning to support the application of protective legislation and policy in the spirit with which there were intended, i.e. to protect the wildlife unequivocally, by ceasing development on the Gwent Levels. Other groups such as the Campaign for the Protection of Rural Wales, Gwent Wildlife Trust and rural communities also have a very important role in the protection of the Levels. Engagement with these groups at the earliest possible opportunity will achieve meaningful decisions and actions agreed with planners.</p> <p>We are therefore calling on Newport Local Authority to add its support to this campaign by using its revised Local Development Plan to stipulate its intention to resist all development in the Gwent Levels in order to enhance the ecological balance and protect all species that live in this area. This step will also assist in preserving the historical and archeological landscape.</p> <p><u>Our Reasons for this Campaign</u> Where it is anticipated there will be potential harm to the wildlife and their habitats, developers propose mitigation schemes to reduce this impact to a level they deem to be acceptable. Our own reviews of these mitigation schemes indicate that they are presented as ‘fait accompli’ solutions despite obvious and serious limitations in their effectiveness. It has become the norm to accept adverse impacts as long as there are some positive mitigation measures in place - even if there is no way of establishing or measuring the success of these measures or of measuring the overall state of biodiversity over time. Monitoring rare, if ever, takes place. Discussion with the</p>	<p>Noted</p> <p>Large scale developments e.g. 10-50MW solar farm is not decided by the LPA but is noted as a DNS and decide by the Planning Inspectorate. This process does include consultation with the Local Planning Authority who is tasked to engage at a pre-application stage, and produce a Local Impact Report (LIR) which is a written report detailing the likely impact of the proposed development on any part of the LPA’s area, based on their existing body of local knowledge and robust evidence of local issues, and should list the impacts and their relative importance.</p> <p>It is not considered appropriate to provide a policy that results in the total ban of development on the Gwent Levels. The importance of the Gwent Levels and its many designations i.e. SSSI, Internally Important Historic Landscape, Special Landscape Area etc are all considerations when considering where to located development. For example, the importance of allowing rural forms of development is to be considered, so too the setting of the urban boundary where development outside this boundary would need to be appropriate in the countryside. The value of this landscape is well understood and the RLDP will consider any proposed development in line with this understanding.</p>

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	<p>inspector at a recent DNS hearing indicated that the landowner has responsibility for the ongoing maintenance and monitoring of the mitigation schemes. NRW and NCC simply don't have the resources to monitor planning conditions. Research by RSPB and others has shown that mitigation measures are rarely maintained after the first few years of a development. The end result is a continued decline in habitats and species - a result which we can no longer tolerate in the current biodiversity crisis.</p> <p><u>The Role and Limitations of Natural Resources Wales</u></p> <p>Our involvement in reviewing planning schemes intended for the Gwent Levels has also shown us that the input of Natural Resources Wales in planning matters has failed to halt habitat and biodiversity loss. The Gwent Levels are in steep decline and have been this way for many years. This is in part because of the limitations of NRW's role as statutory adviser. Their focus may be on the protection of wildlife but equally it is evident that they must try to help develop schemes that accommodate planned development. As long as developers can bring about a theoretical enhancement of habitats they will gain the approval of NRW. But evidence shows us that, as biodiversity is still in decline, despite the past 13 years of NRW's involvement in planning, this is not working.</p> <p><u>The Limitations of Designations, Legislation and Policy</u></p> <p>The current designations and policies, such as SSSI, SINCR, the Natural Habitats Regulations, RAMSAR, and Welsh Government Policy, including Future Wales, and Building Better Places, are aimed at protecting biodiversity. However, these protections are clearly being tested and proving themselves to be inadequate in terms of actual protection for species that are facing extinction in periods of up to less than 10 years, if current rates of decline continue. The statistics behind the protection of these species provide scientific evidence of the truth facing our society, and we are given stark warnings by experts from across a wide range of scientific fields. We need to see a seismic shift whereby enhancement of biodiversity is central to a development, not the box-ticking exercise which it has been until now. This is nowhere more urgent than in environmentally sensitive sites such as the Gwent Levels.</p> <p><u>Damaging Ecology Increases Risk to Human Health from Disease and Pandemics</u></p> <p>One vital fact here is the danger to human life and health that loss of biodiversity can cause. There is increasing evidence that reductions in biodiversity, i.e. loss of species through damage to the dedicated functioning of our ecosystems is known to lead to an increased risk of transmission of viruses from one species to another. Examples of this are the Ebola virus, SARS-2 and Covid 19, all of which have had a devastating impact on</p>	<p>Mitigation and Monitoring are an established part of the planning process. When it comes to impacts on ecology the process for planners to consider is for a development proposal to Avoid>Mitigate>Compensate. The Environment Act 2016 established the need for all proposals to provide a net enhancement and this is set out in national planning policy and is part of the current planning system. The effectiveness of the current policy framework and an investigation into the role of monitoring will be added to the policy review section of the review report. When the policy review is undertaken this shall be a part of its consideration and we would encourage you to engage in this process. Specific detail of the role of mitigation and monitoring for nature conservation and planning is set out in Welsh Government Technical Advice Note 5.</p> <p><i>AMENDMENT Page 43, GP5, Add: Review the process of monitoring in planning decisions.</i></p> <p>The response to question 3 raises an assertion that the Council is planning large scale development on the Levels. It is not clear what development this is referring to but any proposed designations within the next RLDP will be made publicly available for comment and their assessments will take into account the impact on statutory and non-statutory designations.</p> <p>The development of the Replacement LDP its vision, objectives and indeed policies will be</p>

Respondent	Comment	Recommended Council Response
	<p>human mortality. Each incremental step that we take to damage ecological systems anywhere on the planet is endangering our lives and those of future generations.</p> <p>Our Conclusions We believe that local authorities have a vital role to play in the protection of important ecological systems within their boundaries. This is especially significant for Newport City Council in its responsibilities for the protection of the Gwent Levels.</p> <p>Our First Minister, Mr Mark Drakeford took the first step in assuring the protection of the Gwent Levels when he rejected the M4 Black Route because of the damage it would cause to the SSSIs and wildlife in that area. This decision has set a precedent which we wish to see extended to all those who have responsibilities to protect the whole of the Gwent Levels.</p> <p>The biodiversity crisis means that we are in danger of seeing multiple extinctions within the next ten years. The Gwent Levels are one of the most biodiverse habitats in the British Isles, sometimes referred to as Wales' own Amazon Rainforest for the concentration of species in one area. It is the responsibility of all of us to ensure that we actively work towards reversing biodiversity loss immediately.</p> <p>We call on Newport City Council to place a moratorium on all development on the Gwent Levels unless the main objective of the development is to enhance biodiversity and increase natural habitats.</p> <p>Q1 Do you agree that the main issues that should be considered in the full LDP Review have been identified? The Friends of the Gwent Levels have serious concerns that the current designations and legislation are failing to protect the ecology and biodiversity during the planning applicant process. This needs to be addressed by Newport County Council and we would welcome the council's decision to prevent all future development on the Levels.</p> <p>Q2 Do you agree that the existing LDP vision, issues and objectives remain relevant for a revised Plan? The protection of biodiversity needs to be escalated as a key issue for Newport Council, to comply with the Welsh Government announcement that there is a biodiversity crisis, and use policy and legislation to protect the integrity of the Gwent Levels..</p>	<p>available for comment and you are encouraged to provide comment at those stages and continue to engage with the planning policy team throughout the development of the plan.</p>

Respondent	Comment	Recommended Council Response
	<p>Q3 Do you agree that the adopted LDP Spatial Strategy needs reviewing? We have concerns that the council is planning large scale development in the Dyffryn area of the Gwent Levels, an area designated as an SSSI and therefore containing habitats of rare and protected species. This should be reviewed, particularly in light of the need for reduced workspace as a result of Covid-19.</p> <p>Q4 Do you agree with the findings of the LDP policy review? we agree with the review findings that biodiversity and protection of species is paramount in any land development. However, this typically results in the use of mitigation schemes by developers to convince NRW to agree with the project. Mitigation schemes do not enhance biodiversity and the position is always net loss. Monitoring and maintenance of schemes is not delivered long term leading to ongoing degradation of the ecology of the area, therefore the only way forward is for the Council to prevent development in any site where there are designations to protect species in place.</p> <p>Q5 Do you agree that the LDP needs to be revised? If so, short form or full revision? We have read both versions of the LDP and believe there should be specific mention of the Gwent Levels and a pledge to prevent development in this highly sensitive area.</p> <p>Q6: Other Comments on the Draft Review Report We are calling on Newport County Council to add its support to the campaign being led by the Friends of the Gwent Levels by revising its Local Development Plan to stipulate its intention to resist all development in the Gwent Levels in order to enhance the ecological balance and protect all species that live in this area. This step will also assist in preserving the historical and archeological landscape.</p>	
<p>Caerleon Civic Society 00034</p>	<p>Q3 Do you agree that the adopted LDP Spatial Strategy needs reviewing? Should be amended to reflect the Capital City Region and Burns Report proposals, especially public transport infrastructure</p> <p>Q4 Do you agree with the findings of the LDP policy review? However, the review does not adequately cover the issue of increasing social segregation - does not sufficiently explain why Newport has the highest % of LSOA's in the most deprived 10% in Wales, and why many areas of Newport are getting worse. Is this the intended consequence of the current spatial strategy? This issue must be fully explored before adhering to a similar strategy in the future.</p>	<p>Q3: The review report noted the publication of these documents and they shall be taken into account as part of the LDP review.</p> <p>Q4: The WMID is a contextual indicator for the plan. There are clearly many factors that affect society and planning does have an impact. The last strategy was assessed on its impact to society and the monitoring of the plan does not signify a direct and detrimental impact.</p>

Respondent	Comment	Recommended Council Response
	<p>Q6: Other Comments on the Draft Review Report We fully endorse the comments in para 7.2 on the need for joint working, especially in relation to the pressure for development along the Newport/Torfaen boarder</p>	<p>However this assessment on the social/economic/cultural and environmental impacts will be undertaken again to ensure that we are making the choices that have the most positive outcomes. Q6: Joint working is being undertaken and shall continue.</p>
<p>Mr F Cork 00190</p>	<p>Q3 Do you agree that the adopted LDP Spatial Strategy needs reviewing? Conservation of SSSI sites, protection of the reen system, all associated with Question 5 Q5 Do you agree that the LDP needs to be revised? If so, short form or full revision?: Considerable areas of farming land in Nash, Goldcliff & Whitson are being used for Bird Sanctuary 1000 acres, solar farm 400 acres enough is enough</p>	<p>Q3: The importance of the natural and human ecosystem is part of any planning consideration. The policy framework to protect important habitat and species will continue into the new plan and reflect updates to legislation e.g. environment act 2016. Q5: The use of the Gwent Levels for development for renewable energy does take into account the impact on farming land and the environment. Large scale developments e.g. 10-50MW solar farm is not decided by the LPA but is noted as a DNS and decide by the Planning Inspectorate.</p>
<p>Mr Caston 00311</p>	<p>Q3 Do you agree that the adopted LDP Spatial Strategy needs reviewing? Yes Q5 Do you agree that the LDP needs to be revised? If so, short form or full revision?: I question if all elements of the plan need full revision Q6: Other Comments on the Draft Review Report More attention needs to be paid to the regeneration of the City Centre, in terms of retail space/offices/housing</p>	<p>Q3: Noted Q5: This is a relevant point and was considered as part of the review report. There are only two options for a review and the need to consider the strategy means that the most appropriate choice is a full review. Q6: The review report is clear that there needs to be a focus on the regeneration of the city centre.</p>
<p>Llanvaches Community Council 00020</p>	<p>Q1 Do you agree that the main issues that should be considered in the full LDP Review have been identified? note that the review is comprehensive Q3 Do you agree that the adopted LDP Spatial Strategy needs reviewing? noted strategy around brownfield sites. Q4 Do you agree with the findings of the LDP policy review?</p>	<p>Q1: Noted and welcomed Q3: A focus on brownfield development is a requirement of national policy. However, the available and supply of brownfield sites is not yet quantified, the assessment work for the quantification of need will look at the availability of empty properties. There may be a</p>

Respondent	Comment	Recommended Council Response
	note that the findings are evidenced based having completed relevant stakeholder consultations and reassured that NCC will reach out to the communities for opinions.	requirement to identify greenfield sites, of which there were some in the current LDP. Q4: Noted and welcomed
Graig Community Council 00018	<p>Q1 Do you agree that the main issues that should be considered in the full LDP Review have been identified? The key elements at 5.2.1 of the Draft Review Report remain crucial to the plan.</p> <p>Q2 Do you agree that the existing LDP vision, issues and objectives remain relevant for a revised Plan? As above</p> <p>Q3 Do you agree that the adopted LDP Spatial Strategy needs reviewing? Council believes this needs to be looked at</p> <p>Q4 Do you agree with the findings of the LDP policy review? Council is content</p> <p>Q5 Do you agree that the LDP needs to be revised? If so, short form or full revision? Council questions if all elements of the plan need full revision</p> <p>Q6: Other Comments on the Draft Review Report Council believes more attention needs to be paid to the regeneration of the City Centre, whether retail, office space, or housing</p>	<p>Q1: Noted Q2: Noted Q3: Noted Q4: Noted Q5: This is a relevant point and was considered as part of the review report. There are only two options for a review and the need to consider the strategy means that the most appropriate choice is a full review. Q6: The review report is clear that there needs to be a focus on the regeneration of the city centre.</p>
Gwent Ornithological Society 00040	<p>Q1 Do you agree that the main issues that should be considered in the full LDP Review have been identified? These issues need to be converted into actions, particularly on climate change and biodiversity which seem peripheral in importance compared to for example house building.</p> <p>Q2 Do you agree that the existing LDP vision, issues and objectives remain relevant for a revised Plan? These issues need to be converted into actions, particularly on climate change and biodiversity which seem peripheral in importance compared to for example house building.</p> <p>Q3 Do you agree that the adopted LDP Spatial Strategy needs reviewing? Climate Change has become more serious and needs to be taken into account in every policy. All policies. Likewise the biodiversity emergency need to be taken into account in all policies and protected areas increased in number and scope need reviewing.</p> <p>Q4 Do you agree with the findings of the LDP policy review? These issues need to be converted into actions, particularly on climate change and biodiversity which seem peripheral in importance compared to for example house building.</p>	<p>Q1: The RLDP can only make impact on land allocation and set a policy framework for future applications to be considered against. The content of the plan will seek to do what it can in the realm of planning policy to make positive impacts on issues such as climate change and biodiversity value. There is much to consider within a plan and this leads to the need to take a balanced evidenced based approach to consider all forms of what creates sustainable development. The legislative framework and current policy approach which is not proposed to be weakened will continue to address environmental issues alongside other economic and social factors. Q2: See response to Q1.</p>

Respondent	Comment	Recommended Council Response
	<p>Q5 Do you agree that the LDP needs to be revised? If so, short form or full revision? Climate Change has become more serious and needs to be taken into account in every policy. All policies. Likewise the biodiversity emergency need to be taken into account in all policies and protected areas increased in number and scope need reviewing. in the light of the current science and central Government policy objectives. Liike the Climate Change Act and the (still in development) Environment Bill, all development should have a minimum carbon footprint incorporating maximal insulation, solar panels and ground source heat pumps, as well as a requirement to result in improved biodiversity."</p> <p>Q6: Other Comments on the Draft Review Report Climate Change has become more serious and needs to be taken into account in every policy. All policies. Likewise the biodiversity emergency need to be taken into account in all policies and protected areas increased in number and scope need reviewing.</p>	<p>Q3: The impact of climate change will be considered in the review of the spatial strategy and policy development. Q4:See response to Q3. Q5: The impact of climate change and biodiversity will be considered in the review of the spatial strategy and policy development. The need for carbon neutral housing and renewable energy sources to meet government targets is something the RLDP will have regard to. In addition, the environmental act has placed a duty on planning decision to ensure there is a net gain in biodiversity through the planning system and this has been set out in Future Wales: national plan 2040 a national development plan that has to be taken into account during a planning application assessment. Q6: See response to Q5</p>
<p>A (Evans) 00325</p>	<p>Q1 Do you agree that the main issues that should be considered in the full LDP Review have been identified? None</p> <p>Q2 Do you agree that the existing LDP vision, issues and objectives remain relevant for a revised Plan? None</p> <p>Q3 Do you agree that the adopted LDP Spatial Strategy needs reviewing? None</p> <p>Q4 Do you agree with the findings of the LDP policy review? None</p>	<p>Q1 -4: Noted</p>
<p>Mr Deacon 00326</p>	<p>Q1 Do you agree that the main issues that should be considered in the full LDP Review have been identified? They have been identified</p> <p>Q2 Do you agree that the existing LDP vision, issues and objectives remain relevant for a revised Plan? Yes</p> <p>Q3 Do you agree that the adopted LDP Spatial Strategy needs reviewing?</p>	<p>Q1: Noted Q2: Noted Q3: Noted Q4: Noted Q5: The current strategy set out in the adopted LDP has been successful and there is a need to allocate new sites to meet demand e.g. for</p>

Respondent	Comment	Recommended Council Response
	<p>To maintain its relevance</p> <p>Q4 Do you agree with the findings of the LDP policy review? N/A</p> <p>Q5 Do you agree that the LDP needs to be revised? If so, short form or full revision? It is still relevant</p>	<p>housing. In addition, the plan is subject to a statutory 4 year review.</p>
<p>Mr Binns 00327</p>	<p>Q1 Do you agree that the main issues that should be considered in the full LDP Review have been identified? Youth sports playing areas football rugby pitches. Public water access for marine craft and local lifeboat. newport, the only port without access to the water for its residents. get boats on the usk and build a waterfront vibe for newport.</p> <p>Q2 Do you agree that the existing LDP vision, issues and objectives remain relevant for a revised Plan? needs upgrading to include youth sports playing areas football rugby pitches. Public water access for marine craft and local lifeboat. newport, the only port without access to the water for its residents. get boats on the usk and build a waterfront vibe for newport.</p> <p>Q3 Do you agree that the adopted LDP Spatial Strategy needs reviewing? yes needs to move with the times</p> <p>Q4 Do you agree with the findings of the LDP policy review? should say llanwern is still there and going strong. not the old site</p> <p>Q5 Do you agree that the LDP needs to be revised? If so, short form or full revision? future plans. youth sports playing areas football rugby pitches. Public water access for marine craft and local lifeboat. newport, the only port without access to the water for its residents. get boats on the usk and build a waterfront vibe for newport.</p>	<p>Q1: The importance of play space is noted in the report. The importance of the river and the benefits it has is also noted. Water Based recreation and Riverfront Access are covered in policies CF3&4 which are considered to be functioning efficiently. A note on the need to consider if there is anything further these polices can consider and indeed the importance of these policies will be noted in the policy review section of the Review Report. We would encourage projects to enable this to be provided at the Call for Candidate Sites in June this year.</p> <p>AMENDMENT</p> <p>Q2: Noted, the importance of the river is contained within the 'unique natural environment' element of the current LDP vision. However, the vision will need to be reviewed and you are encouraged to provide comment at that stage.</p> <p>Q3: Noted</p> <p>Q4: This comment is understood to relate to the working section of the Llanwern Steelworks. The continuation and future needs of employment sites such as the Steelworks will be considered by the RLDP in consultation with the relevant land/business owners.</p>

Respondent	Comment	Recommended Council Response
		<p>Q5: The importance of sport and recreation is noted in the report. In addition, the important role of the river and the opportunities related to that are understood by the Council; Policies CF3&4 of the current LDP reflects that focus. A review of the LDP will certainly look at the role of the river including its recreational role, however the use of the space is not a land use planning consideration but infrastructure associated with that is.</p>
<p>Mr Stockham 00328</p>	<p>Q1 Do you agree that the main issues that should be considered in the full LDP Review have been identified? No legal protection for SSSI sites and heritage landscapes</p> <p>Q2 Do you agree that the existing LDP vision, issues and objectives remain relevant for a revised Plan? Excepting that there is no legal protection for SSSI sites prohibiting development</p> <p>Q3 Do you agree that the adopted LDP Spatial Strategy needs reviewing? All strategies require periodic review</p> <p>Q4 Do you agree with the findings of the LDP policy review? Legal protection for SSSI sites and heritage landscapes is omitted</p> <p>Q5 Do you agree that the LDP needs to be revised? If so, short form or full revision? Conflicts should be reduced clearing up the need for interpretation.</p> <p>Q6: Other Comments on the Draft Review Report Prohibit development on SSSI sites</p>	<p>Q1: The legal protection for environmental designation and heritage is reflected in the planning policy framework in Wales. The review report notes this legislation in section 3.</p> <p>Q2: The legal protection for national designation such as SSSI does not preclude development. The Wildlife and Countryside Act 1981, as amended by section 75 of, and Schedule 9 to, the Countryside and Rights of Way Act 2000, imposes an important new duty on public bodies where they are exercising statutory functions which are likely to affect the special features of SSSIs. local planning authorities, to apply strict tests when carrying out functions within or affecting SSSIs, to ensure that they avoid, or at least minimise, adverse effects.</p> <p>Q3: Noted</p> <p>Q4: The review report notes this legislation in section 3.</p> <p>Q5: It is not clear what conflicts exist but we welcome your engagement and feedback on</p>

Respondent	Comment	Recommended Council Response
		<p>the development of such topics at the relevant stage of the RLDP process.</p> <p>Q6: See previous responses.</p>
<p>Friends of Newport Ship 00068</p>	<p>Q1 Do you agree that the main issues that should be considered in the full LDP Review have been identified? N/A</p> <p>Q2 Do you agree that the existing LDP vision, issues and objectives remain relevant for a revised Plan?: The Friends of the Newport Ship supports the Local Well-Being Plan for Newport (2018), itself derived from Newport’s response to the Well-being of Future Generations (Wales) Act 2015. A representative of the Friends of the Newport Ship contributed to the development of the Local Well-being Plan and we continue to emphasise that investing in a Ship Centre in which the medieval ship can be re-constructed, and displayed together with other local ships and relevant artefacts is the way forward for Newport (p.10 Section 3.3.1). In particular, the creation of a Newport Ship Centre would make a significant contribution to Objective 1 of the Local Well-Being Plan (p. 16): “People feel good about living, working, visiting, and investing in Newport” which translates into the “Newport Offer” (p. 18). There is a especially strong synergy between the development of the Newport Ship Centre and Priority 10 of this “offer”, namely: “Participation in arts, heritage and history is important for people’s well-being” We support this priority and and note the intention to revise the Well-Being Plan (for 2023 publication) in collaboration with the revision process for the LDP. This is clearly essential, so that the two processes reflect each others mission and goals.(p.11 Section 3.34).</p> <p>Q3 Do you agree that the adopted LDP Spatial Strategy needs reviewing? N/A</p> <p>Q4 Do you agree with the findings of the LDP policy review? Heritage We are, of course, aware of the exciting developments for a Newport Transport Bridge Visitor Centre, which will certainly enhance the attraction of Newport as a place to visit. We are already collaborating with Newport’s other heritage organisations and initiatives such as “Over the Bridge”, to create a heritage package to include the magnificent and internationally recognised Newport Medieval Ship. This would prove a huge boost to the recognition of Newport as a major tourist destination. A critical part of such a strategy would be a well-staffed Tourist Information Centre. We believe that the heritage attractions of Newport, and their benefit for well-being and</p>	<p>Q1: N/A</p> <p>Q2: Noted, we welcome the support for the proposed joint approach in the development of both the well-being and local development plan.</p> <p>Q3: N/A</p> <p>Q4: Your reflection of the effectiveness of heritage policies is noted. We would welcome your engagement and feedback on the development of such topics at the relevant stage of the RLDP process. We shall update the policy review section to note the need to reflect a link with the Newport Offer.</p> <p>AMENDMENT:</p> <p>Q5: Noted</p> <p>Q6: The support noted for the review of the policy is welcomed. We would welcome your engagement and feedback on the development of such topics at the relevant stage of the RLDP process.</p>

Respondent	Comment	Recommended Council Response
	<p>economic growth, have been undersold in the past. We recommend that there should be revised Heritage Policy (p. 27 section 5.3.13) and do not agree that these are currently “functioning effectively”. In particular, under Archaeology (CE 6, p. 47) there should be explicit guidance on the preservation of artefacts as well as sites.</p> <p>Q5 Do you agree that the LDP needs to be revised? If so, short form or full revision? See other comments</p> <p>Q6: Other Comments on the Draft Review Report</p> <p>Economic growth (LDP objective 3) The Review Report states that “tourism is vital to Newport’s economy” (p. 13) and recognises weaknesses in the strategies to address Newport as a tourist destination. This is reflected in the intention to revise the Tourism Policy (CF8, p. 46), including a much-needed re-think of the definition of tourism. The Friends of the Newport Ship supports this ambition, and recommends that this tourism policy should be considered as a Strategic Policy (SP) rather than a Community Policy. We believe that the contribution of the tourism sector to the economic growth of Newport has been underestimated. Currently, it is quoted as providing 5% of the workforce (p. 13) but it could be significantly more than this.</p>	
<p>Home Builders Federation 00095</p>	<p>Para. 3.48 The section on Population and Household Projections should be moved from the end of the Local Context section and given more status.</p> <p>Para 3.49 The impact of Covid-19 should be considered in the short and long term, the current wording states that the impact is not clear, but the short-term impact is arguably now known after nearly a year of the pandemic, it’s the longer-term impact which is unclear and what the return to ‘the new normal’ will, look like is more relevant to a plan for the future.</p> <p>Para. 4.13 The reason for slower delivery on the two strategic sites should be briefly explained at this point.</p> <p>Para. 4.14 Although the final; sentence does not state it, earlier text suggests that there may be a need to find green field sites to meet the housing need. This should be stated at this point. [As at para. 5.3.19]</p> <p>Para. 4.16 Suggest adding the following words [in red] ‘Monitoring has illustrated that further research on this matter is required because in practice, the level of contributions does not always meet that required by policy.’</p>	<p>Agree to move paragraph to Page 10 after sub heading Local Context. AMENDMENT: Move paragraph 3.48 to page 10 under Local Context</p> <p>Amend paragraph 3.49 as suggested. AMENDMENT: First sentence of Paragraph 3.49 to read: The Covid-19 health emergency has posed significant and unprecedented challenge and the long-term impact on businesses and societal norms is still not clear.</p> <p>Agree to provide signpost to AMR objectives which set out the reasons for delay. AMENDMENT: Paragraph 4.13 following second sentence add text: The analysis of the delay is set out in the Annual Monitoring Reports for the LDP in Monitoring Objectives MT4OB4&5.</p>

Respondent	Comment	Recommended Council Response
	<p>Para. 5.2.4 The under delivery of these site should be briefly explained [as comment on para. 4.13].</p> <p>Para. 5.2.8 The point should be made that the NDF has further elevated Newport's position and role over and above where it was when the LDP was written.</p> <p>Para.5.3.16 Suggest adding wording that the trajectory will be developed with key stakeholders including the development industry.</p> <p>Para 5.3.22 This should include wording relating to the Councils position on CIL as well.</p> <p>Appendix 2 SP6 Green Belt – should add a note regarding the position of the NDF and SDP regarding green belt.</p>	<p>It is considered that the first sentence of para 4.14 is clear that the strategy may need to consider greenfield sites.</p> <p>Agree the proposed change to para 4.16. AMENDMENT: Paragraph 4.16 to be amended so second sentence reads: Monitoring has illustrated that further research on this matter is required because in practice, the level of contributions does not always meet that required by policy.'</p> <p>Agree to provide signpost to AMR objectives which set out the reasons for delay. AMENDMENT: Paragraph 5.2.4 following third sentence add text: The analysis of the delay is set out in the Annual Monitoring Reports for the LDP in Monitoring Objectives MT4OB4&5.</p> <p>It is considered that the Review Report is clear on the national status it has gained from the adoption of Future Wales.</p> <p>Agree to amend paragraph to reflect the joint approach. AMENDMENT: update paragraph 5.3.16 second sentence to read: The RLDP will need to include a housing trajectory, developed with key stakeholders including the development industry, taking into account</p> <p>The Council has no intention of introducing a CIL but if this does become a consideration this will be reflected in the RLDP process.</p>

Respondent	Comment	Recommended Council Response
		It is not considered necessary to add a note here because the review report notes the need to reflect Future Wales in the RLDP and this shall be covered.

Consultation Form Responses:

12 of the total responses used the form to respond and each of the responses to those questions is set out in the table below for ease of reference.

Question	Yes	No	?			
Q1 Do you agree that the main issues that should be considered in the full LDP Review have been identified?	8	4	0			
Q2 Do you agree that the existing LDP vision, issues and objectives remain relevant for a revised Plan?	9	3	0			
Q3 Do you agree that the adopted LDP Spatial Strategy needs reviewing?	11	1	0			
Q4 Do you agree with the findings of the LDP policy review?	8	3	1			
Q5 Do you agree that the LDP needs to be revised? If so, short form or full revision?	9	3	0			
	Full			Yes	Short Form	Both
	2			1	0	6

APPENDIX B- CONSULTATION COMMENTS AND RECOMMENDED RESPONSES – DELIVERY AGREEMENT

Draft Delivery Agreement

Consultation January -March 2021

Comments Received and recommended Council Responses

Respondent	Comment	Recommended Council Response
Glamorgan Gwent Archaeological Trust - 00063	<p>The Draft Delivery Document is helpful and the chart for key stages allow us to be aware of upcoming consultations, and areas where we can contribute to the shape of the plan regarding the historic environment. The continuation of provision for the protection and enhancement of the historic environment is welcomed.</p> <p>However, the SPG for Archaeology and Archaeologically Sensitive Areas which is noted, requires updating and amending due to changes in legislation, policy, advice and best practice guidance, as well as to the information in the Historic Environment Record which relates to the Archaeologically Sensitive Areas. We recommend that to comply with professional standards the SPG is updated and we are in a position to update and amend this, should you so require.</p>	<p>Support is noted and we are looking forward to working with GGAT through the RLDP process.</p> <p>Each SPG will be revised as part of our LDP works and we welcome the offer of assisting with updating the Archaeologically Sensitive Areas SPG.</p>
Llanvaches Community Council - 00020	<p>Q1: Do you have any comments concerning the draft Timetable for the Replacement Local Development Plan? No</p> <p>Q2: Do you have any comments concerning the draft Community Involvement Scheme for the Replacement Local Development Plan? No</p> <p>Q3: Do you know of any other groups organisations that should be included in Appendix A Consultation Bodies No</p> <p>Q4: Do you have any other comments on the Draft Delivery Agreement? No</p>	Q1-4: Noted

Respondent	Comment	Recommended Council Response
A (Evans) 00325	<p>Q1: Do you have any comments concerning the draft Timetable for the Replacement Local Development Plan? No None</p> <p>Q2: Do you have any comments concerning the draft Community Involvement Scheme for the Replacement Local Development Plan? No None</p> <p>Q3: Do you know of any other groups/organisations that should be included in Appendix A Consultation Bodies? No None</p> <p>Q4: Do you have any other comments on the Draft Delivery Agreement? No</p>	Q1-4: Noted
Mr Deacon 00326	<p>Q1: Do you have any comments concerning the draft Timetable for the Replacement Local Development Plan? No N/A</p> <p>Q2: Do you have any comments concerning the draft Community Involvement Scheme for the Replacement Local Development Plan? No N/A</p> <p>Q3: Do you know of any other groups/organisations that should be included in Appendix A Consultation Bodies? No N/A</p> <p>Q4: Do you have any other comments on the Draft Delivery Agreement? Yes Newport is improving and the environment must be kept at the forefront of any new developments made</p>	<p>Q1-3: Noted</p> <p>Q4: Noted, these comments are more relevant to the Draft Review Report, improving the environment is a key consideration.</p>
Mr Binns 00327	<p>Q1: Do you have any comments concerning the draft Timetable for the Replacement Local Development Plan? No ok</p> <p>Q2: Do you have any comments concerning the draft Community Involvement Scheme for the Replacement Local Development Plan? Yes slipway for the sara lifeboat and lifeboat house so they dont have to tow a boat 8 miles to launch it. also public slipway access which will encourage water based activities and increase draw to the river front.</p>	<p>Q1: Noted</p> <p>Q2: Noted, the SARA Lifeboat & Rescue Station to be added to the Other Consultees list in Appendix A 1.3. They are welcome to engage with the Planning Policy Team over their future needs.</p>

Respondent	Comment	Recommended Council Response
	<p>Q3: Do you know of any other groups/organisations that should be included in Appendix A Consultation Bodies? Yes cant see the list but SARA the newport lifeboat should be included</p> <p>Q4: Do you have any other comments on the Draft Delivery Agreement? No</p>	<p>Q3: Thank you for the suggestion, SARA Lifeboat & Rescue Station to be added to the Other Consultees list in Appendix A 1.3. AMENDMENT: SARA Lifeboat & Rescue Station to be added to the Other Consultees list in Appendix A 1.3</p> <p>Q4: Noted</p>
Graig Community Council - 00018	<p>Q1: Do you have any comments concerning the draft Timetable for the Replacement Local Development Plan? No Council is content with the timetable</p> <p>Q2: Do you have any comments concerning the draft Community Involvement Scheme for the Replacement Local Development Plan? Yes Council is concerned how this can be achieved considering the current Covid restrictions and how long they may Last</p> <p>Q3: Do you know of any other groups/organisations that should be included in Appendix A Consultation Bodies? No Council is not aware of any</p> <p>Q4: Do you have any other comments on the Draft Delivery Agreement? No</p>	<p>Q1-2: Noted</p> <p>Q3: All engagement and consultation stages of the RLDP will have regard to any local down or restrictions in place. Any appropriate adjustments including re- scheduling of consultation will be considered at each stage of the plan preparation.</p> <p>Q4-5: Noted</p>
Gwent Ornithological Society - 00040	<p>Q1: Do you have any comments concerning the draft Timetable for the Replacement Local Development Plan? No Happy with timetable</p> <p>Q2: Do you have any comments concerning the draft Community Involvement Scheme for the Replacement Local Development Plan? No happy with scheme</p> <p>Q3: Do you know of any other groups/organisations that should be included in Appendix A Consultation Bodies? No no</p> <p>Q4: Do you have any other comments on the Draft Delivery Agreement? No</p>	<p>Q1-4: Noted</p>
Friends Of Newport Ship - 00068	<p>Q1: Do you have any comments concerning the draft Timetable for the Replacement Local Development Plan? Yes The Friends of the Newport Ship support the proposal to ensure incorporation of the well-being goals, with a clear indication of a link</p>	<p>Q1: As stated in Paragraph 3.1 of the DA Welsh Government have set an expectation that a replacement LDP should not take longer than 3.5</p>

Respondent	Comment	Recommended Council Response
	<p>with the priorities of the "Newport Offer" (p. 4, section 2.7 & p. 7, section 2.15) The timetable (p. 9) is rightly to be regarded as subject to various risks (p.29), but 3.5 years should be the absolute maximum, given other external changes that might take place during that time, such as new legislation.</p> <p>Q2: Do you have any comments concerning the draft Community Involvement Scheme for the Replacement Local Development Plan? Yes The Friends of the Newport Ship supports the extensive consultation that is planned in order to build community consensus, and especially the extra measures to be used for the "Hard to reach Groups" (p. 15). We recommend the addition of the category "local charities", to the list of consultees given (p. 14, section 4.5). We have noted, however, that Friends of the Newport Ship appears in the more detailed list in Appendix A (p.25).</p> <p>Q3: Do you know of any other groups/organisations that should be included in Appendix A Consultation Bodies? No</p> <p>Q4: Do you have any other comments on the Draft Delivery Agreement? Yes Candidate sites We have not been able to access the current criteria for candidate sites, but recommend that they should specifically exclude, under eligibility for a candidate site, any site which is archaeologically significant as demonstrated by a Historic Environment Record (designated by the Glamorgan-Gwent Archaeological Trust) and/or scheduled via CADW and/or recorded by the Royal Commission on Ancient and Historical Monuments of Wales. There are more than 500 such sites in Newport, each one of great value to the city's historic heritage.</p>	<p>years, plus one three-month slippage period. While it would be possible to reduce this timeline by only allowing the statutory 6 week consolation period rather than the 8 weeks as proposed, it is considered this would be at the detriment of the engagement process. As stated in Paragraph 3.1 <i>"Every effort will be made to adhere to this timetable. Stages 5-8 are noted as indicative because these stages are dependent on various factors including the number of representations received during Deposit Plan consultation or the number of examination hearing sessions required. The Council has less control over these factors."</i></p> <p>Q2: Agree, the term local charities, in paragraph 4.5 has been collectively grouped with local organisations. To provide greater clarity the inclusion of charities is proposed to be included. AMENDMENT: Paragraph 4.5 amended to read: Extensive engagement will be undertaken at each key stage of the RLPD process. Efforts will be made to engage with communities, businesses, local organisations and charities, landowners, and developers to ensure a broad range of feedback. We shall engage with a variety of interest groups including community councils, the citizens panel, chambers of commerce, planning agents, prospective developers and groups including local wildlife trusts, community groups and young people.</p> <p>Q3: Noted</p> <p>Q4: NCC is not currently at the Candidate site stage. The Friends Of Newport Ships comments are noted</p>

Respondent	Comment	Recommended Council Response
		and will be taken on-board during the preparation and going forward during the Candidate site stage
Caerleon Civic Society - 00034	<p>Q3: Do you know of any other groups/organisations that should be included in Appendix A - Consultation Bodies? GREEN CAERLEON - CONTACTABLE VIA THEIR FB PAGE CELF CAERLEON ARTS through their participation in the Caerleon Tourism Development Forum</p> <p>Q4: Do you have any other comments on the Draft Delivery Agreement TRANSPARENCY SEEMS TO BE THE KEY IF TORFAEN'S RECENT EXPERIENCE IS ANYTHING TO GO BY – RESIDENTS NEED TO KNOW EXACTLY WHY SITES ARE PICKED OR DROPPED AT THE CANDIDATE SITES STAGE AND WHAT COMBINATION OF CRITERIA HAVE BEEN USED. INDEPENDENT EVALUATION WORK SEEMS TO BE USEFUL.</p>	<p>Q3: Thank you for the suggestion, Green Caerleon and Celf Caerleon Arts to be added to the Other Consultees list in DA Appendix A 1.3.</p> <p>AMENDMENT: Green Caerleon and Celf Caerleon Arts to be added to the Other Consultees list in Appendix C 1.3</p> <p>Q4: Caerleon Civic Society’s comments are noted and the Council will undertake each stage of the plan in line with Government Guidance including the Development Plans Manual (Edition 3).</p>
The Coal Authority - 00324	We hold no records of past coal mining legacy features at surface or shallow depth in the Newport City Council area. On this basis we have no specific comments to make in respect of the Local Development Plan consultation.	Noted We look forward to working with The Coal Authority through the RLDP process.
Dwr Cymru Welsh Water - 00013	We have no specific comments to make but look forward to engaging with you through the Replacement LDP process.	We look forward to working with DCWW through the RLDP process.
Friends Of Gwent Levels - 00322	<p>Q3: Consultation Bodies Other groups such as the Campaign for the Protection of Rural Wales, Gwent Wildlife Trust and rural communities also have a very important role in the protection of the Levels. Engagement with these groups at the earliest possible opportunity will achieve meaningful decisions and actions agreed with planners.</p>	Q3: Both the Protection of Rural Wales, Gwent Wildlife Trust along with Community Councils have already been included in DA Appendix A – A 1.2a. Voluntary Bodies and will be consulted through the process.
Campaign For Real Ale (Gwent) - 00078	ii) It would have been nice to have captions on the photographs, explaining what they are. Some are obvious, but others are not.	Agreed, captions will be included, and the naming error shall be rectified in the final version of the Delivery Agreement and Review Report.

Respondent	Comment	Recommended Council Response
	iii) It is the Office FOR National Statistics, not 'OF'! You'd think that in Newport, of all places, the name would be correct!!	AMENDMENT: Add captions to images within the documents. Update Glossary entry for ONS in DA & RR. Update ONS title in Paragraph 3.48.
Natural Resources Wales - 00004	We have reviewed your Review Report and Delivery Agreement and have no comments to make on the reports in terms of our role as a statutory planning advisor.	Noted, we look forward to working with NRW through the RLDP process.
Mineral Products Association – 00060	With respect to the above consultation, it is worth noting that for a number of days the consultation documents were not accessible due to the Council's website not being available. The Council may wish to extend the period of consultation to take this in to consideration. We were however, grateful the Council managed to forward hard copies for our perusal.	We apologies for any technical difficulties. The consultation period was two weeks longer than that specified as best practice, so it was not considered necessary to extend the consultation period this time. It is also noted that there were no requests for an extension of time to supply comments were received by the Council.

Consultation Form Responses:

9 of the total 15 responses used the form to respond and each of the responses to those questions is set out in the table below for ease of reference.

Question	Yes	No	No Response	Summary
Q1 Do you have any comments concerning the draft Timetable for the Replacement Local Development Plan?	6	2	1	Comments received were in support of the proposed timetable
Q2 Do you have any comments concerning the draft Community Involvement Scheme for the Replacement Local Development Plan?	3	5	1	Questioned the Impact on engagement with Covid-19, supports the approach, highlighted missing stakeholder
Q3 Do you know of any other groups/organisations that should be included in Appendix A – Consultation Bodies?	3	4	0	Highlighted 3 missing stakeholder organisations
Q4 Do you have any other comments on the Draft Delivery Agreement	3	5	1	Highlighted importance of environment when considering development, seeking candidate site criteria and enforced the

				need for transparency of decisions making through the RLDP process.
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APPENDIX C – RR & DA CONSULTEE LIST

Consultation on the Draft Deliver Agreement and Review Report was carried out with the following:

- 31 Specific Consultation Bodies,
- 66 General Consultation Bodies,
- 55 Other Consultees,
- 346 Members of the Public / Organisations / Companies that requested to be to be contacted at the key stage of the RLDP process before 7th January 2021.

Specific consultation bodies

- 1 Welsh Government (Planning Division will co-ordinate consultations)
- 2 Natural Resources Wales
- 3 Cadw
- 4 Network Rail Infrastructure Ltd
- 5 Office of Secretary of State for Wales
- 6 Telecommunication Operators – EE, Vodafone and O2, BT Virgin Media, Mobile Operators Association
- 7 Aneurin Bevan Health Board
- 8 Gas and Electricity Licensees – National Grid, Wales & West Utilities, Western Power Distribution, British Gas and SSE
- 9 Sewerage and Water undertakers – Dwr Cymru/Welsh Water
- 10 Department for Transport (including Secretary of State for functions previously exercised by the Strategic Rail Authority)
- 11 UK Government Departments – Department of Business, Energy and Industrial Strategy
- 12 Home Office
- 13 Ministry of Defence

Neighbouring Local Authorities:

- 14 Caerphilly County Borough Council
- 15 Cardiff City Council
- 16 Monmouthshire County Council
- 17 Torfaen County Borough Council

Community Councils:

- 18 Bishton Community Council
- 19 Coedkernew Community Council
- 20 Goldcliff Community Council
- 21 Graig Community Council
- 22 Langstone Community Council
- 23 Llanvaches Community Council
- 24 Llanwern Community Council
- 25 Marshfield Community Council
- 26 Michaelston-y-fedw Community Council
- 27 Nash Community Council
- 28 Penhow Community Council
- 29 Redwick Community Council
- 30 Rogerstone Community Council
- 31 Wentlooge Community Council

General Consultation Bodies:

- 1 Gwent Association of Voluntary Organisation
- 2 Caerleon Civic Society
- 3 Campaign for the Protection of Rural Wales, Newport and Valleys Branch
- 4 Citizens Advice Bureau Newport City Council
- 5 Duffryn Community Link
- 6 Echo Stow Hill

7	Chartered Management Institute (Cymru)	39	Society for the Protection of Ancient Buildings
8	Children's Commissioner for Wales	40	South Wales Trunk Road Agency
9	Coed Cymru	41	South Gwent Ramblers Association
10	Community Transport Association	42	Sports Wales
11	Confederation of Passenger transport	43	Stagecoach
12	Crisis	44	Sustrans Cymru
13	Crown Estate	45	The Energy Savings Trust
14	Design Commission for Wales	46	The National Trust
15	District Valuer Services	47	The National Library of Wales
16	Fire and Rescue Service	48	The Older Peoples Commissioner for Wales
17	Logistics UK's	49	The Theatres Trust
18	Llamau	50	The Woodland Trust
19	Future Generations Commissioner for Wales	51	Transport for Wales
20	Gwent Constabulary	52	Visit Wales (Welsh Tourist Board)
21	Heritage Amenity Societies, including The Victorian Society, The Georgian Group, Twentieth Century Social, CBA, Historic Gardens Trust.	53	Wales Council for Voluntary Action
22	Institute of Civil Engineers	54	Welsh Language Commission
23	National Farmers Union	55	WWF Cymru
24	Newport's Citizen Panel		
25	Newport Harbour Commissioners		
26	Newport Housing Trust		
27	One Voice Wales		
28	Open Spaces Society		
29	Planning Inspectorate		
30	Public Health Wales		
31	Rail Freight Group		
32	Ramblers Cymru		
33	Road Haulage Association Ltd		
34	Royal Institute of Chartered Surveyors		
35	Royal Mail		
36	Royal Town Planning Institute Cymru		
37	RSPB Cymru		
38	Shelter Cymru		