

Report

Cabinet

Part 1

Date: 13 October 2021

Subject **Replacement Local Development Plan**

Purpose To provide an update on the progression of the Replacement Local Development Plan (RLDP) and report on the consultation responses received on the Integrated Sustainability Appraisal (ISA) Scoping Report and seek approval of the ISA Framework. The purpose of the Integrated Sustainability Appraisal is to maximise the RLDPs contribution to sustainable development by using the approved ISA Framework to assess policies, options and plan allocations.

Author Planning Policy Manager

Ward All Wards

Summary The Replacement Local Development Plan (RLDP) has undertaken its first formal stages – the Call for Candidate Sites and consultation on the draft Integrated Sustainability Appraisal (ISA) Scoping Report. Sustainable development is at the heart of the development plan process and to ensure that the RLDP maximises its contribution to achieving this, an Integrated Sustainability Appraisal (ISA) is undertaken. There are legislative requirements to undertake such assessments which include equality, language, health and well-being assessments. There are five key stages to an ISA and the initial ‘scoping’ stage has been drafted and made available for public comment. The scoping stage is largely an evidence gathering stage, providing a thorough understanding of the current economic, social, environmental and cultural well-being context to gather baseline data to identify and focus on the significant issues in the area. From this baseline, 10 themes along with 15 objectives have been developed which form the framework to assess the effects of the plan policies and proposals. It is imperative that the Council is satisfied that the Scoping Report has captured all the significant issues facing Newport and agree with the assessment framework which shall be used to assess all future aspects of the RLDP.

Proposal **Cabinet is asked to:**

1. **Note and consider the consultation comments received on the ISA Report along with the proposed officer responses;**
2. **Approve the ISA Framework and the ISA Report (updated post consultation);**
3. **Agree that officers can start engaging with stakeholders in order to prepare a draft Vision and Objectives for Newport plus growth options for the plan period. (Proposals and feedback will then be returned to Cabinet for consideration).**

Action by Acting Head of Regeneration, Investment and Housing

Timetable Immediate

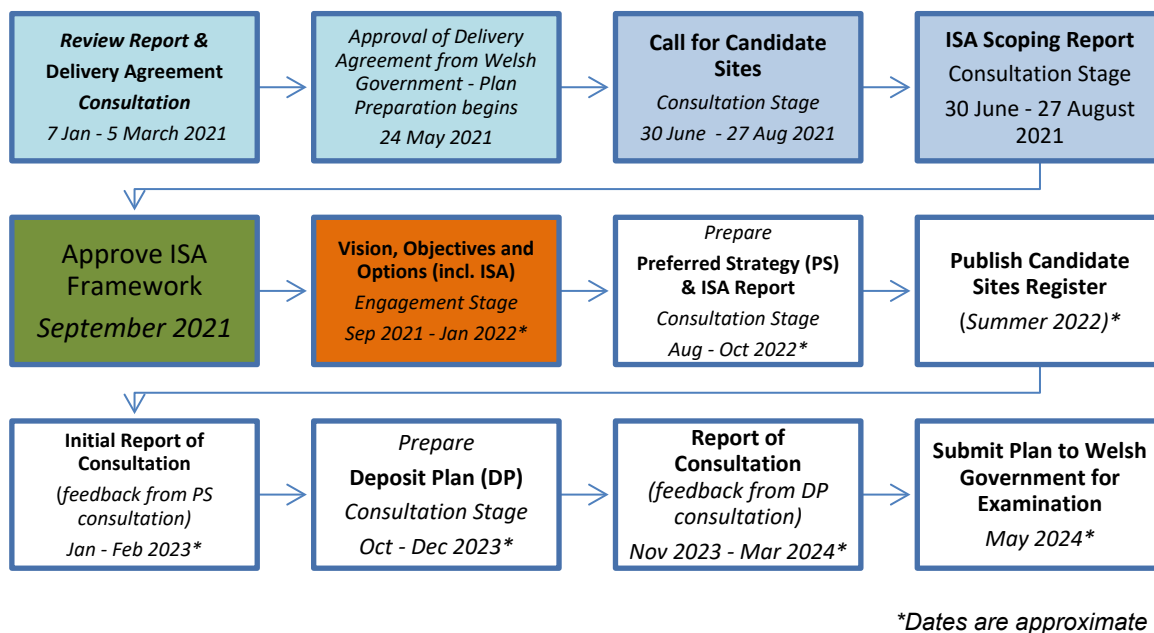
This report was prepared after consultation with:

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

Signed

Background

There are many formal stages to the preparation of a RLDP and these key stages are set out below:



We are currently at the stage highlighted in green – ‘Approve the ISA Framework’.

Candidate Sites have been submitted and we have begun the process of assessing them. The assessment will be based on the published assessment methodology which will include feedback from key consultees e.g. Natural Resources Wales, Dwr Cymru etc. The assessment will also include the proposed sites being scored against the ISA Framework (which this paper seeks to approve). The Candidate Site Register will not be made available for public comment until Summer 2022.

The next stage (in orange) in the RLDP process is the creation of the Vision and Objectives of the Plan. A Vision needs to articulate the overall aim of the plan and how Newport will change over the plan period. The Objectives are developed from the key economic, social, environmental and cultural issues identified in Newport. The Objectives need to be deliverable and add detail to the vision. When read collectively, the vision and objectives should set a clear context for the LDP’s strategy.

Following the initial Vision and Objectives stage, engagement will commence on the growth and spatial options for Newport (still within the orange stage). This second part of the stage will consider a number of alternative growth and spatial options for the RLDP. In summary, this is setting out the level of housing and employment land provision the RLDP will seek to deliver and the broad location for this development. A report will identify the Council’s preferred growth and spatial options that are considered best to address Newport’s key issues/challenges and meet the RLDP objectives. All this work will be achieved through engagement and consultation with the public and key stakeholders.

Both the Vision & Objectives and Growth Options stages will be assessed against the endorsed ISA framework to ensure alternatives have been considered and the best sustainable strategy has been selected.

Integrated Sustainability Appraisal

There is a statutory requirement for RLDP for Newport to be subject to a number of specific appraisals and assessments to ensure sustainable development is at the heart of the plan. This legal requirement is met through the creation of an Integrated Sustainability Appraisal (ISA). The aim of ISA is to inform and influence the plan-making process with a view to avoiding and mitigating negative impacts and

maximising positive impacts. Through this approach, the ISA for the RLDP seeks to maximise the developing plan's contribution to sustainable development.

The ISA fulfils the requirements and duties for:

- Sustainability Appraisal (SA) and Strategic Environmental Assessment (SEA),
- Equalities Impact Assessment (EqIA),
- Health Impact Assessment (HIA),
- Welsh Language Impact Assessment (WLIA), and
- Well-being of Future Generations (WBFG).

The aim of the ISA is to inform and influence the plan-making process with a view to avoiding and mitigating negative impacts and maximising positive impacts.

There are 5 key stages to an ISA which is integrated with the LDP process:

ISA Stage	LDP Stage
Stage A - Scoping	Call for Candidate Sites
Stage B - Appraisal of Alternatives	Preferred Strategy
Stage C - Assessment of Deposit LDP	Deposit Plan
Stage D - Examination and Adoption	Examination
Stage E – Monitoring	Adoption

Current Stage - Scoping Report

The Scoping Report is the first stage of an ISA process and sets out the sustainability appraisal issues and objectives/criteria against which the RLDP strategy, policies and proposals will be assessed.

The scoping report sets out a review of the plans, programmes, strategies and policies relevant to the preparation of the RLDP, together with a review of the environmental, social and economic baseline characteristics of Newport. The result is the identification of those key issues facing Newport which have been set out under 10 specific themes (in no specific order):

- | | |
|--|---|
| <ol style="list-style-type: none"> 1. <i>Economy and employment</i> 3. <i>Health and wellbeing</i> 5. <i>Transport & movement</i> 7. <i>Biodiversity and geodiversity</i> 9. <i>Landscape</i> | <ol style="list-style-type: none"> 2. <i>Population and communities</i> 4. <i>Equality, diversity and inclusion</i> 6. <i>Natural resources (air, land, minerals and water)</i> 8. <i>Historic environment</i> 10. <i>Climate change (mitigation and adaptation)</i> |
|--|---|

A key purpose of the public consultation was to establish whether all the relevant issues have been covered in the scoping report. From this thematic assessment, an ISA framework has been developed which sets out a methodological framework for the assessment of the draft RLDP, please see Appendix A for full details.

The process of developing the framework is a logical one:

1. The key issues raised within each theme forms the basis for a specific objective,
2. To aid the plan assessment against an objective, a number of specific questions are set to ask how will the plan/policy help to achieve the objective.

These questions will be used to consider the impact of policies and proposals so as to ensure the plan can maximise its contribution to sustainable development. Therefore, it is imperative that the Council is satisfied with the ISA Framework because of its influence over the preparation of the RLDP.

Consultation Feedback and Response

The Scoping Report was subject to an 8-week public consultation which resulted in 9 responses. Each of the responses are set out in full in Appendix B of this report. The responses raised the following matters:

- Submission of relevant sources of information e.g. recently published Gwent State of Nature Report or the Newport Green Infrastructure Assessment.
- Identification of key issues to be included/undertaken e.g. Welsh Government declaration of a Nature Emergency, impact of air quality on the environment as well as people, reflecting the need to plan for mineral supplies and the need to scope the impact on phosphates from new developments.

- Identification of topics that need to become more focused on Newport specific matters e.g. investment in City Centre, lack of facilities in rural areas, reflection of specific demographic needs within different parts of Newport, the retention and expansion of tree cover, the impact of poor land management e.g. over grazing, unauthorised developments, the physical constraints of flood risk and ground instability, as well as strictly controlling/preventing development on the Gwent Levels.
- The need for the ISA to influence the RLDP e.g. in terms of creating a healthy green environment, provide a green recovery post Covid, the impact of climate change through the development of environmentally supportive policies.

Taking into account the comments received, the Scoping Report has been updated to include those relevant sources of information to ensure the document is up to date. The majority of comments raised issues or recommendations for what they want taken into account through plan-making or the next stages of the ISA. These have not resulted in specific changes to the Scoping Report but shall inform the development of both the replacement LDP and ISA work as relevant. The Scoping Report has been updated to reflect the results of these recommendation.

Financial Summary (Capital and Revenue)

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 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	

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 the scoping report and endorsing the ISA framework	H	L	The Council has signed up to the LDP process, which includes the ISA. This is the second LDP for Newport and the process is established and understood.	Planning Policy 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. 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 draft 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 scoping report has reviewed relevant Council plans and priorities to extract those key issues/themes that the replacement plan will need to consider, including the well-being duty. These themes have resulted in a specific ISA framework for Newport which sets an assessment methodology against which the RLDP will be assessed to ensure it maximises its contribution to sustainable development.

Options Available and considered

- 1) Approve the post consultation version of the ISA Report and ISA Framework, and agree to begin engagement on developing the Vision and Objectives and Growth Options.
- 2) Amend the post consultation version of the ISA Report and ISA Framework, and agree to begin engagement on developing the Vision and Objectives and Growth Options.
- 3) Do not approve the post consultation version of the ISA Report and ISA Framework and restart the stage.

Preferred Option and Why

- (1) To approve the post consultation version of the ISA Report and ISA Framework and agree to begin engagement on developing the Vision and Objectives and Growth Options. The post consultation version of the ISA Report has taken into account key local issues raised through research and feedback from public consultation. This option will ensure that the ISA Framework is endorsed and the development of the RLDP will maximise its contribution to sustainable development whilst meeting its legislative requirements and ensuring it is providing the most appropriate and ambitious policy framework for Newport. The approval to begin work on the next key stages will also allow the Council to adhere to the agreed timetable as set out in the Delivery Agreement.

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. As a shortfall in reserve funding is currently projected, opportunities to bolster the reserve in the intervening years, from any in-year underspends within RIH, should be considered.

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). In May 2021 full Council, sitting as the local planning authority, approved and adopted the revised Review Report and Delivery Agreement following public consultation and agreed to their submission to Welsh Government, in order to trigger the commencement of the LDP review process. Cabinet are now being asked to agree to the next stages of the review process. There is a statutory requirement under the Environmental Assessment of Plans and Programmes (Wales) Regulations 2004 and Section 39 (2) of the Planning and Compulsory Purchase Act 2004 for the Replacement Local Development Plan (RLDP) to be subject to an Integrated Sustainability Appraisal (ISA). The purpose of the ISA is to assess the extent to which the emerging policies will help achieve the wider environmental, economic, social and cultural objectives of the RLDP. The ISA scoping report is the first stage of this process and sets out the sustainability appraisal issues and objectives/criteria against which the RLDP strategy, policies and proposals will be assessed. The draft ISA scoping report has been subject to public consultation and, where appropriate, it has been updated to reflect the responses received. The final scoping report identifies 10 themes and 15 objectives which will form the basis of the ISA assessment framework. Cabinet is asked to approve the updated scoping report and the ISA framework and authorise officers to proceed with the engagement with key stakeholders to develop the Vision, Objectives and growth options. The final RLDP will be a policy framework document that will need to be approved and adopted by full Council, but Cabinet are able to approve the scoping report and ISA Framework.

Comments of Head of People and Business Change

From an HR perspective, there are no staffing implications to this report.

The report writer has detailed how the ISA process encompasses and therefore meets the well-being goals, well-being objectives and sustainable development principle. The report writer also confirms that an FEIA has not been completed in this instance as the ISA process effectively encompasses an FEIA within its own assessment process.

Scrutiny Committees

None

Fairness and Equality Impact Assessment:

- **Wellbeing of Future Generation (Wales) Act**
- **Equality Act 2010**
- **Socio-economic Duty**
- **Welsh Language (Wales) Measure 2011**

The ISA fulfils the requirements and duties for:

- Sustainability Appraisal (SA) and Strategic Environmental Assessment (SEA),

- Equalities Impact Assessment (EqIA),
- Health Impact Assessment (HIA),
- Welsh Language Impact Assessment (WLIA), and
- Well-being of Future Generations (WBFG).

The aim of the ISA is to inform and influence the plan-making process with a view to avoiding and mitigating negative impacts and maximising positive impacts. By undertaking this process the Council can be confident that the replacement LDP will be prepared in a manner which clearly considers its impact on these aspects of fairness and equality. The engagement of the ISA work is undertaken in line with the agreed Community Involvement Scheme (set out in the approved Delivery Agreement) as approved by Full Council and Welsh Government.

An FEIA has not been undertaken for this specific piece of work as the ISA will effectively incorporate an FEIA within itself. The ISA Framework includes 10 objectives, and as the RLDP progresses, every new policy or site will need to be assessed against these objectives and the associated questions. In terms of the Well-being and Future Generations Act, the ISA Framework includes a 'health and wellbeing' objective. Every policy/site introduced by the RLDP will need to consider how it will improve the health and wellbeing of residents within Newport and there are five more detailed questions that will need to be addressed.

Similarly with the Equality Act, socio-economic duty and Welsh language measures, the ISA framework includes an objective entitled 'Equality, diversity and inclusion'. Again, all policies/sites will need to consider how they will reduce poverty and inequality, tackle social exclusion and promote community cohesion. There are nine associated questions relating to this objective, including a question on how the policy/site will promote Newport's bilingual public services and increase the use of the Welsh language in Newport?

In summary, the ISA is an appraisal (or an assessment) itself, and will go beyond that of an FEIA. Consequently, it is not considered necessary to undertake an FEIA in relation to this specific report.

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 scoping report or ISA framework. One of the objectives of sustainable development guided by the ISA process will be to ensure that places are secure and safe.

Consultation

The draft Integrated Sustainability Appraisal Scoping Report was subject to an 8 weeks consultation from 30 June – 27 August 2021. The responses are set out in full in Appendix A of this report.

Background Papers

Post Consultation Integrated Sustainability Appraisal Scoping Report



Newport ISA Scoping
Report_Final 16 Sept :

Draft Integrated Sustainability Appraisal Scoping Report

[ISA Scoping Report](#) (pdf)

[ISA Scoping Report: Appendix B](#) (pdf)

[ISA Scoping Report: Non-Technical Summary](#) (pdf)

RLDP Delivery Agreement, including Community Involvement Scheme:

<https://www.newport.gov.uk/documents/Planning-Documents/Replacement-Local-Development-Plan-2021/LDP-Delivery-Agreement-Final-25MARC21ENG.pdf>

Appendix A – Integrated Sustainability Appraisal Framework

This appendix presents the sustainability topics, objectives and assessment questions that form the ISA framework. The ISA framework draws together the ISA objectives identified under each theme through scoping, with the aims of addressing the key issues identified for each theme. Taken together the ISA objectives form a methodological framework guiding the subsequent assessment. Furthermore, these objectives have been linked to the relevant wellbeing goals established through the Well-being of Future Generations (Wales) Act 2015.

Theme	ISA objective	Assessment questions - will the plan/ policy help to:	Relevant wellbeing goal
Economy and employment	Support a strong, diverse and resilient economy, with innovative responses to changing conditions and support for a strong future workforce.	<ul style="list-style-type: none"> Support the nationally important role of Newport's economy in the South East Wales Region and Western Gateway, and as part of the Cardiff Capital Region? Provide sufficient land for businesses to grow? Support the creation of accessible new jobs? Ensure the capacity of educational facilities keep pace with population growth? Enhance the vitality and resilience of the town centre and retail centres? Safeguard existing employment areas? 	A Prosperous Wales A Resilient Wales A More Equal Wales A Wales of Cohesive Communities A Globally Responsible Wales
Population and communities	To provide a sufficient quantity of good quality market and affordable homes, and community infrastructure, in sustainable locations to meet identified needs.	<ul style="list-style-type: none"> Meet the identified housing needs, including affordable, for Newport City? Ensure an appropriate mix of dwelling sizes, types and tenures to meet the needs of all sectors of the community? Provide housing in sustainable locations that allow easy access to a range of local services and facilities? Promote the development of a range of high quality, accessible community facilities, including specialist services? 	A Resilient Wales A Healthier Wales A More Equal Wales A Wales of Cohesive Communities A Wales of Vibrant Culture and Thriving Welsh Language
	To enhance design quality to create places for people that maintain and enhance community and settlement identity.	<ul style="list-style-type: none"> Improve cross-boundary links between communities? Promote the development of a range of high quality, accessible community facilities, including specialist services 	A Prosperous Wales A Resilient Wales A Healthier Wales A Wales of Cohesive Communities A Wales of Vibrant Culture and Thriving Welsh Language
Health and wellbeing	To improve the health and wellbeing of residents within Newport	<ul style="list-style-type: none"> Encourage healthy lifestyles and reduce health inequalities? Promote access to health, social, recreational and leisure facilities for all sectors of the community? Enhance multifunctional green infrastructure networks throughout the plan area? Provide and enhance the provision of community access to open/ green space? Improve access to the countryside for recreation? 	A Resilient Wales A Healthier Wales A More Equal Wales A Wales of Cohesive Communities A Wales of Vibrant Culture and Thriving Welsh Language
Equality, diversity and inclusion	To reduce poverty and inequality; tackle social exclusion and promote community cohesion	<ul style="list-style-type: none"> Reduce inequalities and deprivation across Newport? Improve equality of opportunities amongst all social groups? Contribute to a reduction in crime and social disorder and the fear of crime, promoting safer neighbourhoods? 	A Prosperous Wales A Resilient Wales A Healthier Wales A More Equal Wales

		<ul style="list-style-type: none"> Promote, strengthen and enhance the cultural identity of Newport? Protect and provide improved local, social, recreational and leisure facilities for all sectors of the community, and improve access to them to maximise opportunities for community development and social welfare? Ensure an appropriate mix of dwelling sizes, types and tenures to meet the needs of all sectors of the community? Provide housing in sustainable locations that allow easy access to a range of local services and facilities? Promote the development of a range of high quality, accessible community facilities, including specialist services? Promote Newport's bilingual public services and increase the use of the Welsh language in Newport? 	<p>A Wales of Cohesive Communities A Wales of Vibrant Culture and Thriving Welsh Language A Globally Responsible Wales</p>
Transport and movement	Increase sustainable transport use and reduce the need to travel.	<ul style="list-style-type: none"> Reduce the need to travel through sustainable patterns of land use and development? Encourage modal shift to more sustainable and active forms of travel? Enable transport infrastructure improvements? Extend or improve active travel networks? Support the uptake of low carbon transport? Contribute towards the EV charging network? Facilitate working from home and remote working? Provide improvements to and/ or reduce congestion on the existing highway network? 	<p>A Prosperous Wales A Resilient Wales A Healthier Wales A More Equal Wales A Wales of Cohesive Communities A Globally Responsible Wales</p>
Natural resources	To identify and pursue any opportunities to reduce, or at least, minimise population exposure to air pollution.	<ul style="list-style-type: none"> Reduce the need to travel? Encourage journeys to be made by sustainable means (active travel or public transport)? Avoid any adverse effects on air quality and for people exposed to poor air quality? Improve air quality in areas identified as of concern? Promote and facilitate the use of electric vehicles? Promote and facilitate enhancements to green infrastructure networks to facilitate increased absorption and dissipation of NO₂ and other pollutants? 	<p>A Resilient Wales A Healthier Wales A More Equal Wales A Wales of Cohesive Communities A Globally Responsible Wales</p>
	To make the best use of previously developed land and existing buildings to minimise pressure for greenfield development and protecting, where possible, higher grade agricultural land.	<ul style="list-style-type: none"> Minimise the loss of potentially high-grade agricultural land to developments which will not make use of the soil as an agricultural resource? Encourage the use of previously developed land? Encourage development-related remediation works which could reduce the presence of contaminated land in Newport? 	<p>A Resilient Wales A Wales of Cohesive Communities A Globally Responsible Wales</p>
	To conserve, protect and enhance the water	<ul style="list-style-type: none"> Reduce water consumption? 	<p>A Resilient Wales A Globally Responsible Wales</p>

	environment, water quality and water resources.	<ul style="list-style-type: none"> • Ensure an adequate supply of water can be provided to sustain the development considering current and future projections of water availability and water use? • Reduce the potential for contamination of waterbodies and courses? • Reduce the potential for agricultural practices to contribute towards nitrate-based pollution of waterbodies and courses? 	
Biodiversity	Protect and enhance biodiversity within and surrounding the plan area.	<ul style="list-style-type: none"> • Minimise impacts on designated and important biodiversity and provide net gains where possible? • Protect and enhance ecological networks, including those that cross administrative boundaries? 	<p>A Resilient Wales A Healthier Wales A More Equal Wales A Globally Responsible Wales</p>
Historic environment	Preserve and enhance Newport's heritage resource, including its historic environment and archaeological assets.	<ul style="list-style-type: none"> • Conserve and enhance the significance of buildings and structures of architectural or historic interest, both designated and non-designated, and their setting? • Conserve and enhance the special interest, character and appearance of conservation areas and their settings? • Conserve and enhance archaeological remains, and archaeologically sensitive areas, and support the undertaking of archaeological investigations and, where appropriate, recommend mitigation strategies? 	<p>A Prosperous Wales A Resilient Wales A Healthier Wales A Wales of Cohesive Communities A Wales of Vibrant Culture and Thriving Welsh Language A Globally Responsible Wales</p>
	Promote understanding of the Newport's cultural heritage.	<ul style="list-style-type: none"> • Support access to, interpretation and understanding of the historic and cultural environment, including the Welsh language? 	<p>A Resilient Wales A Healthier Wales A More Equal Wales A Wales of Cohesive Communities A Wales of Vibrant Culture and Thriving Welsh Language A Globally Responsible Wales</p>
Landscape	To protect and enhance the quality and character of Newport's landscape, townscape, and seascape.	<ul style="list-style-type: none"> • Ensure that Newport's most valuable landscapes, townscapes, and seascapes are conserved and enhanced? • Ensure that Newport's two areas of 'undisturbed' tranquil landscapes are preserved in their tranquillity? • Use natural landscape features to mitigate any potential effects on nearby and distance interpretations of its landscapes? 	<p>A Prosperous Wales A Resilient Wales A Healthier Wales A More Equal Wales A Wales of Cohesive Communities A Wales of Vibrant Culture and Thriving Welsh Language A Globally Responsible Wales</p>
Climate change	Support the resilience of the Newport Area to the potential effects of climate change, including flooding from fluvial, coastal and surface water sources.	<ul style="list-style-type: none"> • Avoid development in areas at risk of flooding, taking into account the likely future effects of climate change? • Increase resilience of the built and natural environment to the effects of climate change? • Ensure that the potential risks associated with climate change are considered in new development in the plan area? • Improve and extend green infrastructure networks in the plan area to support climate change adaptation? • Sustainably manage water run-off, reducing surface water runoff (either within the plan area or downstream)? • Minimise flood risk for key infrastructures, such as transport and power? 	<p>A Resilient Wales A Healthier Wales A More Equal Wales A Wales of Cohesive Communities A Globally Responsible Wales</p>

Reduce Newport's contribution to climate change from activities which result in greenhouse gas emissions.

- Increase the number of new developments meeting or exceeding sustainable design criteria?
- Reduce energy consumption from non-renewable sources?
- Offer the opportunity to exploit opportunities for a heat network in Central Newport?
- Generate energy from low or zero carbon sources?
- Reduce the need to travel or the number of journeys made?
- Promote the use of sustainable modes of transport, including walking, cycling and public transport?
- Ensure rural development does not contribute towards further increases in high energy use and unsustainable travel?

A Prosperous Wales
A Resilient Wales
A Healthier Wales
A More Equal Wales
A Wales of Cohesive Communities
A Globally Responsible Wales

Appendix B – Consultation comments and recommended Council responses.

Consultee	Response	Recommended NCC Response
K. Smith	<p>I wish to express my support for a number of issues raised in the ISA report: in relation to climate change.</p> <p>1) Development of a heat network zone in the centre of Newport</p> <p>2) Increase in onshore wind in Newport, especially to the North West.</p> <p>I live in Bassaleg in the North West of Newport and note that Clearwell Farm has a single turbine.</p> <p>I would support the development of onshore wind projects in Newport, particularly if they were owned by the community, local authority or a public body. This could also help to support service provision and community development, and replace EU funding.</p>	Noted with thanks.
NCC-Connected Communities Manager	<ul style="list-style-type: none"> •The information on ethnic minority populations could be further enhanced by linking to ward profiles (eg highlighting the high levels of people from a minority ethnic background that are in Pill, Victoria etc) and data should be broken down into individual ethnicities rather than talking about communities as a homogenous group. I couldn't see any Religion section within the protected characteristics part either? •The section on gender identity and sexual orientation mixes up sex with gender identity. Whether someone is a man or woman is their sex, gender identity refers to whether someone identifies as male, female, transgender etc. This should be made clear. •Does this need to reference our Gypsy and Traveller communities? I know this is picked up through the GTAA but not sure how this links? •It would be really good to see the scope make reference to intersectionality, as equality impacts tend to be layered – for example recognising that there are areas of Newport which have a younger, predominantly ethnic minority population which are also those more likely to be deprived areas, with less green spaces and more social housing etc. Similarly disabled people are more likely to be living in poor housing conditions and experiencing poverty, LGBT young people are more likely to experience homelessness etc. 	<p>Noted, the baseline information will be updated to link to ward profiles and a religion section added.</p> <p>Noted, this section will be updated to provide greater clarity.</p> <p>Noted, the baseline information will be updated to include information on Gypsy and Traveller communities.</p> <p>Noted, the scoping information will be updated to reflect this.</p>
The Coal Authority	<p>Our records indicate that there are no recorded coal mining legacy features present at surface and shallow depth in the Newport City area and no surface coal resource.</p> <p>On the basis that there are no recorded shallow coal mining legacy hazards present we have no specific comments to make on the Sustainability Appraisal Scoping report.</p>	Noted.
Friends of the Gwent Levels	<p>Friends of the Gwent Levels is a grass roots community campaign group, established to resist large scale developments, especially large-scale renewable schemes.</p>	Noted

	<p>Our aim is to influence current local and national planning policy by emphasising the dangers of developments on the Levels when so little is known about the impact of these large schemes on wildlife, their habitats and breeding. This is particularly important for the species that led to the designation of SSSi for most of the Gwent Levels and also for UK endangered species such as the dormouse and otters.</p> <p>We are engaging with the current Newport County Council LDP review process, and have prepared the following comments on the Integrated Sustainability Appraisal because it has identified some key issues which have particular significance for the future of the Gwent Levels and indeed, our own objectives to protect the area and gain support to develop it as a wildlife hub, with active transport networks that welcome and encourage residents and visitors to experience nature and wildlife in their natural habits.</p> <p>Please note that we have only given comments and have highlighted the key issues that are relevant to the objectives of our campaign.</p>	
	<p>SECTION 4 OF APPRAISAL : HEALTH AND WELL-BEING SECTION 5 OF APPRAISAL : TRAVEL</p> <p>We would draw attention to Planning Policy Wales which highlights the importance of health and well-being as a core principle within future planning. It particularly refers to giving consideration of the possible impacts of developments on health, whilst also responding to climate change.</p> <p>Access to open spaces and designated biodiversity sites is a crucial component of achieving health and well-being. However, the appraisal has identified that open green space provision is below the recommended level (in hectares) for several communities within the Gwent Levels. This is known to impact on both wellbeing and overall health through limited access to space for exercise.</p> <p>The appraisal also comments on the importance of improving access to the countryside for recreation. The increase in cycling during the last 6 years is notable, showing an increase in demand for suitable safe routes. Equally, the LDP must respond to the need for more sustainable transport in light of the climate emergency.</p> <p>• Our recommendation: We suggest providing better access to more designated wildlife and biodiversity hubs, linked with active transport routes across the Gwent Levels, would support the sustainability of this beautiful area, whilst also providing Newport residents and tourists access to nature for recreation, learning and exercise through safe cycling routes.</p>	<p>Noted, the comments and recommendation will be taken into account through the next stages in plan-making and the ISA process.</p>

**SECTION 7 OF APPRAISAL: NATURAL RESOURCES
SECTION 8 OF APPRAISAL: BIODIVERSITY AND
GEODIVERSITY SECTION 9 OF APPRAISAL:
LANDSCAPE**

The appraisal identifies that Newport has a good supply of brownfield sites suitable for development, which is important as other policy approaches are also pushing the need to improve environmental outcomes with the protection of natural resources, to maximise beneficial outcomes for environmental factors.

It recommends the need to conserve, protect and enhance the water environment. This step is critical across the Gwent Levels into order to protect and enhance habitats, encourage increased biodiversity, whilst reducing the rate of species decline in the area, including endangered species.

However, section 8 of the appraisal also identifies the need for planning to take conservation of wildlife and habitats into account. It points out that new development must not undermine the integrity of these sites, and any ecological network must be supported and enhanced, both locally and regionally.

Section 9 of the appraisal highlights the importance of preserving rural landscapes where there are significant historical interests, such as the Gwent levels, which should be protected.

• Our recommendation: The Gwent Levels cannot be regarded as an area suitable for any major development. It's biodiversity is recognised by the SSSI designations in place to protect the species that reside there. However, it's relationship with the RAMSAR site, the Severn Estuary, is misunderstood, such that any development on the Levels is likely to directly affects bird species that use the Levels for wintering, sheltering, and breeding. Therefore, this key area of waterways and flat landscape provide a safe environment for many protected and rare species, and should be protected from any development.

• Presently, developers are promoting the use of mitigation scheme to achieve reported net biodiversity gain. However , the implementation and monitoring of these schemes is not monitored or reported, and there is almost no data that confirms the impact of the development on the ecology, biodiversity and habitats of key species. Therefore, it is critical that research is conducted to understand the impact of ANY development in sensitive areas such as the Gwent Levels.

Noted, the comments and recommendations will be taken into account through the next stages in plan-making and the ISA process.

	<ul style="list-style-type: none"> • Until this data is obtained, we recommend the suspension of all development across the Gwent Levels. • Current plans to install large scale renewable energy schemes on the Gwent Levels will have an extreme negative impact on the landscape, therefore we recommend that any plans for such schemes must be resisted to maintain the features and character of this attractive rural and tranquil landscape. • Brownfield sites are suitable and therefore recommended for this type of development. 	
<p>RSPB</p>	<p>We welcome the opportunity to provide the Council with our comments in light of the current consultation on the Integrated Sustainability Appraisal. We hope that our comments in relation to the nature emergency and the urgent need to address biodiversity decline will be taken on board and this and future documents will reflect the nature and climate crises.</p> <p>General Comments</p> <p>In addressing our concerns with the ISA we also wish to make the following general comments at this stage which we hope will be taken into consideration when preparing the Preferred Strategy.</p> <p>Gwent Levels</p> <p>After a long period of major industrial, transport and housing developments which have profoundly reduced the original footprint of the Gwent Levels and altered the landscape we are now seeing further erosion of the Sites of Special Scientific Interest (SSSIs) on the Gwent Levels by way of small and incremental piecemeal, development. The likes of which are not assessed cumulatively in terms of impact as they do not meet the thresholds contained within the EIA regulations. This slow piecemeal erosion is taking place across the multiple designations and safeguarded SSSIs of which there are eight across the Gwent Levels landscape (See attached plan of Gwent Level SSSIs located within Newport). Furthermore, there is also a large number of Sites of Importance for Nature Conservation (SINCS). The Gwent Levels lie alongside the Severn Estuary, which is designated as a SSSI, Special Protection Area, Special Area of Conservation and Ramsar Site. Parts of the Gwent Levels are adjacent to the River Usk, a SSSI and Special Area of Conservation. The continued pressure for developments on the Levels does not comply with the Welsh Governments stance in declaring a nature emergency in addition to the declared climate emergency. More needs to be done in terms of preventing development on the Gwent Level SSSIs and ensuring that it is properly safeguarded against general development that will incrementally create cumulative impact on protected sites.</p>	<p>Noted, the comments and recommendations will be taken into account through the next stages in plan-making and the ISA process.</p> <p>The ISA Scoping Report was prepared prior to the Welsh parliament's announcement (on 30 June 2021) that they are declaring a nature emergency. The scoping information will be updated to reflect this.</p>

Consultation Response

We are disappointed in the AECOM Integrated Sustainability Appraisal insofar as within its opening sections there is no mention of the Nature Emergency. The Senedd has declared a Nature Emergency which the Welsh Government has committed to tackle with decisive action. We are sure you will be aware of the recent joint report from IPBES and the IPCC, which emphasises the critical importance of designing policies, plans and actions to address climate change and biodiversity loss together. This joint emergency needs to be at the heart of the Replacement Local Plan and the Integrated Sustainability Appraisal. Addressing the nature and climate emergency needs to be the main focus on ensuring that housing, employment, economic growth etc are delivered in a way that seeks to address and not exacerbate the crises we are facing.

We respectfully request that the ISA is reviewed in light of the comments made below.

There is an urgent need to address the nature emergency. This needs to be undertaken in a manner that seeks to halt biodiversity loss and begin to reverse the decline. The Replacement LPD and the Sustainability Appraisal of the Plan need to provide the framework to ensure that there is no further loss of nature and that there is a commitment to working with others to reverse the decline.

Future Wales encourages Local Planning Authorities to work with Stakeholders, including NRW to develop policies for key areas and the Gwent Levels has been identified as one of the nine National Natural Resource Areas within Future Wales. It is acknowledged that better evidence is required on the relative impacts of different types of development on the features of the Levels, and Welsh Government is seeking to catalyse this action as a pilot for National Natural Resource Management Areas and Future Wales Policy 9. The Sustainability Appraisal needs to ensure that in assessing the key objectives set out halting and reversing biodiversity decline is delivered.

A commitment from the Council is required at the heart of the plan to protect, enhance and deliver new environmentally supportive policies that address, with urgency the way in which we need to change our practices and policies. It is no longer good enough to just refer to the creation of 'sustainable communities', new policies require us to adapt our priorities and deliver in them in a more holistic manner.

In June 2021, IPBES & IPCC published a joint report concluding that neither climate change nor biodiversity loss can be successfully resolved without tackling both together. It highlighted the potential for narrowly-focused action on climate to be damaging for nature, and vice versa. This

underlines the need for nature recovery, as well as climate, to be taken into account in decision making at all scales. We therefore request that the nature emergency is also addressed within this report with the same level of commitment given to climate.

Consultation Form

1. Are any key documents or messages missing from the policy context review carried out for each Integrated Sustainability Appraisal theme?

Comments:

No reference to Nature Emergency as declared by the Senedd. The dual nature and climate crises need to be addressed in tandem and reflected in all LDP documents.

3. Do you have any comments on the identified key issue: Integrated Sustainability Appraisal theme?

Comments:

See above and attached letter.

4. Do you have any comments on the Integrated Sustainability Appraisal objectives and/ or assessment questions for each Sustainability Appraisal theme?

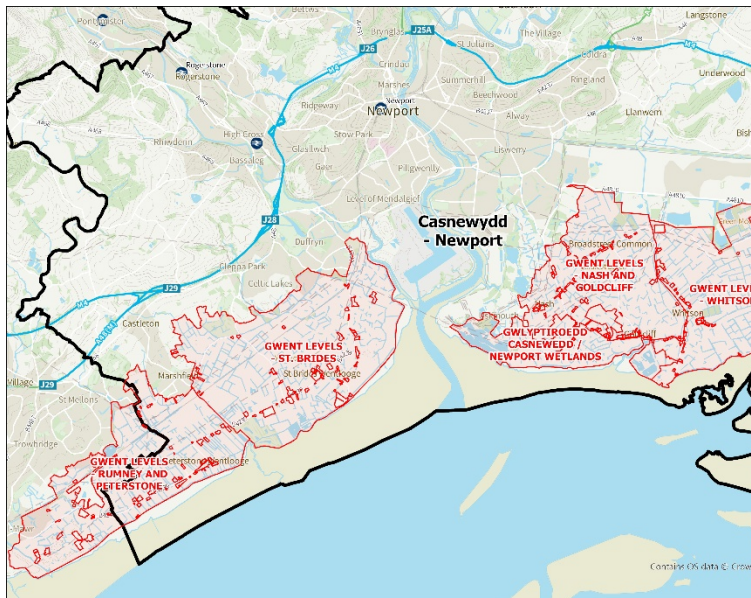
Comments:

As above all objectives need to reflect the dual crises in c attached letter.

5. Do you have any other comments on the Integrated Appraisal Scoping Report?

Comments:

See attached letter.



Sites of Special Scientific Interest (SSSI) located on the Gwent Levels within Newport

Natural Resources Wales

As statutory consultees in the Sustainability Appraisal (incorporating the Strategic Environmental Assessment) our comments focus on this element of the Integrated Sustainability Appraisal (ISA).

We recognised that the purpose of the ISA is to identify likely significant effect of an emerging plan and inform and influence the plan-making process. This includes but is not

	<p>limited to economic, social, environmental, and cultural effects with a view to avoid and mitigate negative impacts and maximise positive impacts.</p> <p>The SA/SEA is an iterative and on-going process. We recommend the ISA (specifically the SA/SEA element) should be a living document. This is particularly important when you consider that baseline information is evolving, and other plans and programmes are emerging or updating throughout the RLDP lifetime. The SA/SEA should therefore be kept under review throughout the RLDP preparation.</p> <p>We advise the following is considered within any updated ISA.</p> <p>3. Population and Communities We note the references to housing, recreation and green wedges. We acknowledge the reference to homeworking including an emphasis on local services, and the need for high quality green open spaces. Local quality green space, close to where people live is really important in creating active environments. We advise the recently published New Resource to help build healthier environments and combat obesity in Wales - Public Health Wales (nhs.wales) is considered. This is also relevant to Chapter 4. Health and Wellbeing.</p> <p>4. Health and Wellbeing We note on page 30 reference to 'Open green space provision in Newport' in Table 4.2. We advise during 2021, Newport CC have been working on a Green Infrastructure Assessment. This assessment should be included in this ISA report.</p> <p>6. Transport and Movement Although touched upon in the main chapter, we note that the ISA objectives as outlined on page 57 of the report do not include specific mention of active travel. We advise this is included.</p> <p>7. Natural Resources (Air, Land, Minerals and Waste) <i>Air Quality (7.4)</i> We note the reference of air pollution on human health and the environment. We advise that impacts on sensitive habitats, for example nutrient loading on protected/designated sites in the area should also be considered. It should also be cross referenced in Chapter 8 Biodiversity and Geodiversity, which has not explicitly set out aerial pollution in the key issues section. <i>Water Resources (7.9)</i></p> <p>Although briefly touched upon as a key issue in section 7.38, there is no discussion given to water quality for the regions waterbodies in line with the Water Framework Directive (WFD).</p>	<p>Noted, the scoping information will be updated to include a reference to Public Health Wales and any relevant publications.</p> <p>Noted, the Green Infrastructure Assessment will inform the ISA process and plan-making.</p> <p>Noted, the ISA objective and assessment question for the transport and movement theme will be updated to include active travel.</p> <p>Noted, the scoping information under the Natural Resources and Biodiversity themes will be updated to reflect this comment.</p> <p>Noted, the scoping information will be updated to include relevant information on water quality. The updated TAN 15 will be taken into account once published.</p>
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	<p>We also note in terms of flooding, Welsh Government are preparing to publish the updated Technical Advice Note 15: Development, flooding and coastal erosion this September. This will include a new Flood Map for Wales which incorporates an allowance for climate change (which isn't incorporated into the Development Advice Maps referred to in the current TAN15). The ISA will need to take account of this new evidence when it is published.</p> <p>The new Flood Map for Wales is a product of a wider piece of work called Flood Risk Assessment Wales. This includes further data, such as 'communities at risk' register. This could also be used in the ISA, which could provide the basis of how to measure positive effects from the RLDP in terms of reducing flood risk for existing communities. There are also multiple benefits with blue infrastructure (i.e. flood risk mitigation such as making space for water, natural flood management) and green infrastructure, which promotes biodiversity, helps water quality as well as the well-being, social and economic benefits. The ISA should influence the need for new background papers or technical documents such as a Strategic Flood Consequences Assessment.</p> <p>In addition, we note that there is insufficient reference here to concerns around phosphate levels for all river Special Areas of Conservation (SACs) for which the River Usk is notified for. We advise that all LDPs should be screened to determine whether any policies are likely to have a significant effect on a river SAC.</p> <p>Policies can be screened out as not likely to have a significant effect in relation to increased phosphorus loading if there are no pathways for increased phosphorus impacts.</p> <p>Any LDP policies relating to schemes for private sewage treatment systems should ensure no adverse effects on the integrity of any river SACs. Further information is available on our website here: Natural Resources Wales / Advice to planning authorities for planning applications affecting phosphorus sensitive river Special Areas of Conservation. This should also be cross referenced in section 8.6 River Usk SAC and SSSI, under Biodiversity and geology.</p> <p><i>Land and Soil (7.16)</i> We note that contaminated land issues in Newport are not confined to landfill sites. We advise this is further explored with any updated ISA.</p> <p><i>Waste (7.23)</i> The waste section makes little reference to construction and demolition waste. Welsh Government recently published Beyond Recycling, which is their plan to make the circular economy in Wales a reality, keeping resources in use and avoiding waste. Behind this is a strategic assessment which provides the evidence base for the</p>	<p>Noted, the Flood Map for Wales and wider Flood Risk Assessment Wales will inform the ISA process and plan-making.</p> <p>A separate HRA process is being carried out for the RLDP and this will determine if there are likely to be significant effects on any European sites as a result of the plan.</p> <p>Noted, the scoping information will be updated to include a reference to phosphate levels and potential impacts on biodiversity.</p> <p>Noted.</p> <p>Noted, the scoping information will be updated to include a reference to Beyond Recycling.</p>
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strategy. This replaces the “Collections, Infrastructure and Markets” (CIM) Sector Plan which is referenced in PPW. The strategic assessment sets out waste forecasts/prediction figures for each Welsh economic area (north, south west and south east).

8. Biodiversity and Geodiversity

We advise that the Gwent State of Nature Report recently published, with information about state of species and habitats across SE Wales (inc. Newport). Blaenau Gwent CBC: Resilient Greater Gwent (blaenau-gwent.gov.uk) We note that the South East Area Statement has been used throughout the document, however, we consider that Nature Emergency is missing. We recommend that further information about the nature emergency and about the imperative to build resilient ecological networks should be included.

On 30th June 2021, the Welsh Government declared a nature emergency. By putting nature into recovery, we can tackle climate change. Thriving habitats can safely lock up vast amounts of carbon, while providing other vital benefits that help us adapt to our future climate, such as flood prevention, clean water and improved health and wellbeing.

Green recovery: In October 2020, the Welsh Government published Covid Reconstruction: Challenges and Priorities, our approach to reconstruction. The collective response to the Covid-19 pandemic represents a once in a generation opportunity to reset our individual and collective values and priorities, realigning them with those required to create a more sustainable future.

A key aspect of our reconstruction is a commitment to embrace greener and just initiatives, which support our places in Wales to reconstruct in a sustainable way. The consensus across Wales, UK, Europe and beyond is that recovery from Covid-19 must address the underlying nature and climate emergencies. The calls for individuals, businesses, governments and global institutions to refocus and accelerate the response to the pandemic along a pathway which both restores nature and decarbonises our economy have been increasing in strength.

The inclusion of green recovery and the integrated approach which considers nature and climate together as the foundation of economic, social and political renewal and regeneration in Wales, is an extremely important sustainability objective to include. This new emphasis should be integrated throughout the RLDP development, reflecting the focus of the Well-Being of Future Generations (Wales) Act 2015, Environment Act and Planning (Wales) Act

We would be happy to continue to work with you on the ISA and evidence gathering for the RLDP, and provide further details as discussed throughout.

The ISA Scoping Report was prepared prior to the Welsh Parliament's announcement (on 30 June 2021) that they are declaring a nature emergency. The scoping information will be updated to reflect this and the Gwent State of Nature Report and Covid Reconstruction.

<p>Mineral Products Association</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, QPA Northern Ireland, MPA Scotland and the British Calcium Carbonate Federation, it has a growing membership of 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. Each year the industry supplies £20 billion worth of materials and services to the Economy and is the largest supplier to the construction industry, which had annual output valued at £151 billion in 2016. 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 reference to the above consultation, please find attached the MPA Wales' representations. We are conscious that the consultation is in parallel to a call for sites and that the ISA would appear to be relying solely on the minerals industry coming forward with sites for potential mineral extraction or relying on neighbouring authorities to address the indicated shortfall. We feel the Council could be more proactive through policies in the plan in addressing the recognised shortfall and look forward to this being full considered within the evidence base.</p> <p>Consultation Form: Are any key documents or messages missing from the policy context review carried out for each Integrated Sustainability Appraisal theme?</p> <p>Comments: Table 2.1 – Include the Regional Technical Statement (2020) (RTS). Without minerals and raw materials to fuel the economy, few if any of the Local Plan aspirations can be delivered. Housing, transport, renewable energy, manufacturing, retail, building conservation and vernacular to name a few, all rely on minerals and mineral products, and this should be recognised in the ISA.</p> <p>Para 2.3 - Planning Policy Wales (PPW) is not only supplemented by TANs, but also by Mineral Technical Advice Notes, (MTANs).</p> <p>Table 7.1 – There is no reference to the respective MTANs, notably MTAN1: Aggregates (https://gov.wales/minerals-technical-advice-note-mtan-wales-1-aggregates).</p>	<p>Noted, reference to the RTS will be included in Table 2.1.</p> <p>Noted, where necessary reference will be included to the MTANs.</p> <p>Noted, the reference will be updated.</p>
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	<p>Table 7.1 – The RTS link is to the draft version and is dated 2019. The link should be amended to the final version published by WG in September 2020. Confirmation of the Council’s endorsement of the RTS would be helpful.</p> <p>Para 7.3 – There are no key messages relating to the requirement for a steady and adequate supply of minerals as required by PPW or reference to the MTANs.</p> <p>Para 7.20 – We believe that mineral planning in Wales is more than <i>“at the strategic scale requires collaboration between Local Authorities.”</i> PPW states that <i>“Planning authorities should include policies in their development plans for the maintenance throughout the plan period of land-banks for non-energy minerals which are currently in demand.”</i></p> <p>Para 7.20 – It is not clear what is meant by the terms used in the infographic <i>“Export of Sand and Gravel wharves supply to cross boundary locations and regional partners”, “Import of land won minerals from cross boundary locations and regional partners”</i>. Further, it is also necessary to safeguard minerals and minerals infrastructure, not just transportation hubs.</p> <p>Para 7.21 – The RTS is a Welsh Government Document prepared on behalf of the NWRAP and SWRAP. It is not produced by the SWRAP.</p> <p>Para 7.21 - This paragraph states that <i>“new proposals willbe required from industry”</i>. However, whilst site specific allocations do provide more certainty, there are other options open to the Council as indicated in PPW, through the identification of Preferred Areas and Areas of Search. The council should look to address any shortfall, through the systematic appraisal of mineral resources and appropriate identification.</p> <p>Para 7.21 – Whilst it is correct to indicate that Newport is required to make future provision within the LDP for crushed rock aggregates at 0.434 million tonnes per year, it would be appropriate to further explain the requirements of the RTS, that this equates to 10.854 million tonnes for crushed rock, over 25 years.</p> <p>2. Are there any key data sources or trends missing from the baseline information for each Integrated Sustainability Appraisal theme?</p> <p>Comments: Yes, under the minerals section, the report should refer to the Annual Monitoring Reports published by the SWRAP. In addition, the report should refer to the AM2019 report recently published by the British Geological Survey on behalf of the Government. These document highlight matters such as sales, reserves and inter-regional flows and provide a helpful evidence base.</p>	<p>Noted, this key message will be included.</p> <p>Noted, this paragraph will be updated.</p> <p>Noted, infographic will be updated to improve clarity.</p> <p>Noted, paragraph will be updated to reflect this comment.</p> <p>Noted.</p> <p>Noted, paragraph will be updated to reflect this comment.</p> <p>Noted, the scoping information will be updated to reflect the Annual Monitoring reports published by the SWRAP.</p>
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	<p>3. Do you have any comments on the identified key issues for each Integrated Sustainability Appraisal theme?</p> <p>Comments: See above comment. As with most ISAs, the report fails to make the link between the development aspirations and the need for a steady and adequate supply of minerals and mineral products.</p> <p>4. Do you have any comments on the Integrated Sustainability Appraisal objectives and/ or assessment questions for each Integrated Sustainability Appraisal theme?</p> <p>Comments: The ISA objectives include references to the requirements of PPW, MTAN1 or the RTS as the respective documents apply to the delivery of a steady and adequate supply of minerals to meet the needs of society.</p> <p>The ISA should recognise the biodiversity net benefits associated with the restoration of mineral sites. It is inevitable that building conservation/aesthetics and vernacular considerations will require appropriate building materials being specified. The source of such materials should be considered.</p> <p>5. Do you have any other comments on the Integrated Sustainability Appraisal Scoping Report?</p> <p>Comments: We are pleased this is stage one of the appraisal as further work needs to be undertaken in ensuring the local plan properly addresses the policy requirements for minerals as required by PPW, the MTAN and the RTS (2020).</p>	<p>Noted.</p> <p>Noted, but this also needs to be balanced alongside the impacts on biodiversity of new mineral sites for extraction.</p>
<p>Wentlooge Community Council</p>	<p><u>Historic environment/Landscape</u></p> <p>In our opinion the scoping document falls short on controls to protect the area of the Wentlooge Levels. The issue of its erosion has been highlighted by the statement from the Minister, but this does not seem to be reflected in the this document.</p> <p>We would look to see tighter planning controls and a strategy to stop the overdevelopment of this area from stable blocks, business premises to industrial activity such as tipping which is having a detrimental effect on the eco system and the promotion of tourism not to mention the negative effect of the well being of the communities in this area.</p> <p><u>Rights of way</u></p> <p>We would like to see the ancient pathways of the area considered within the RLDP to upgrade to rights of way take the Levels back to an area that is used by ramblers, the local community and people who would consider this as a place to visit will in the Newport area on vacation.</p>	<p>Noted, the scoping information recognises the sensitivity and importance of the Gwent Levels for biodiversity, landscape and the historic environment. Coastal erosion is also highlighted as an issue under the climate change theme. However, clearer links could be made between coastal erosion and impacts on biodiversity. The scoping information will be updated to reflect this. The other issues/ comments raised will be taken into consideration at the next stage of the</p>

This would also benefit from some form of visitor centre and focal points on the Levels. This has become even more of an urgency with the local pubs and restaurants closing over recent years. This could also be addressed within planning to stop this building being turned into Expensive housing which has no local benefit but takes away community hubs this again influencing wellbeing and a point of interest for tourism.

Flood defences

With climate change there should be included within RLDP the need to address flood defences not only from the sea but the drainage of rainwater that flows to the area from the surrounding high ground. This has been more apparent with the floods around the village over recent years.

Ground movement

The area of the Wentlooge levels has seen some significant ground movement effecting many properties. This could be addressed within the RLDP if there were policies put in place to stop the removal of clay which is, which is the base of the sump in this are holding the area together. the digging of large holes and pits and raising of the ground with material not native to this area. This also would be a certain benefit to the biodiversity as it would remove some of the negative impacts. To lose green space in this way only reduces carbon absorption within a time of climate change is vital.

Waste

We would like to see it formally documented within the RLDP that no waste sites will be permitted within the SSSI area of the Levels, Green Wedge, and Green Belt. This is so important to an area of such significance that is constantly targeted by this blight.

Keeping of horses

It has been established on several occasions especially in planning appeals that the land in certain parts of the levels has deteriorated due to over grazing. One of the key factors in this is the erection of stables to a degree that the area is in our opinion at saturation point. The issue this brings is that the planning consent for the size of the stable block does not consider the are required per horse. As laid out in the guidelines. Hence a stable block will be built for 6 horses on land that can only accommodate maybe 2.

This situation brings harm to the biodiversity of not just fields that are stripped but the land around it not to mention the detrimental effect on the animal itself.

ISA process and through plan-making.

	<p>These constructions lead to a significant change to the character of the landscape and the wildlife that should thrive within it.</p> <p>Examples of this are widespread.</p> <p><u>Health and wellbeing</u></p> <p>This needs serious consideration within this revision as not only the area of the Wentlooge Levels, but the West of Newport has been overlooked in regards of facilities and transport.</p> <p>If we take the Levels as an example without personal transport you cannot access in an emergency a doctor’s surgery, pharmacist, optician, post office, sports facility, library, or a shop on the same day. The transport provided is next day only at present and with an ageing population this becomes more of a concern going forward.</p> <p>This Scoping Document has nothing to address these issues and we would like to see the inclusion of community hubs especially as the last remaining public house and restaurant is likely to close in the next 18 months, better access to transport is a necessity for a basic standard of living.</p> <p><u>City Centre</u></p> <p>Newport city centre needs more focus as the out-of-town shopping has removed the hart of the city and pushed most things east making it even more difficult to access. We would suggest more focus on the centre which would encourage more people to visit enabling local transport to the one location easier. Which could lead to less traffic congestion.</p> <p>Newport has a lot to be proud of and I give the example of the ship that was recovered this is one of a few that is recognised worldwide for its significance to the history of ship building. Other cities invested in purpose build housings for the ships to be displayed and reaping the benefits of the tourism these unique displays bring.</p> <p>In conclusion we feel that that there should be more focus on protecting and developing what would need to for future generations as well as the current generation with green space being critical in a time that we need to address climate change.</p>	
<p>The Woodland Trust</p>	<p>Coed Cadw - the Woodland Trust works at national level to seek to create a favourable policy environment for the retention and expansion of tree cover in urban areas in Wales. We endeavour to assess planning threats to ancient trees and ancient woods on a UK wide basis,</p>	<p>Noted, ancient trees and woodlands will be taken into consideration through the next stages of the ISA process, which includes the</p>

	<p>however we do not have capacity to engage in the local planning system across Wales. Please send any information on such threats to campaigning@woodlandtrust.org.uk. We expect all local authorities and public bodies to do their utmost to protect and sustain all ancient trees and ancient woodland, and we may challenge those who fail to do this. More guidance and information on how you can help is on our website: https://www.woodlandtrust.org.uk/about-us/woodland-protection/threats-from-human-impact/ Advice to local authorities on planning impacts on biodiversity, including trees and woodland is provided by Natural Resources Wales. The services they provide are described on their website https://naturalresources.wales/guidance-and-advice/business-sectors/planning-and-development/?lang=en and they provide regional contact details. Our advice to local authorities and all owners of public land is that they should be fully aware that the premature removal of any mature tree or shrub may adversely affect the health and welfare of residents, and cause biodiversity loss and environmental degradation. This cannot be fully or quickly mitigated by new planting.</p> <p>We urge local authorities to invest for the long term to ensure healthy and attractive tree cover for all their communities, creating and sustaining a minimum 20% tree canopy cover in all urban areas. We suggest this requires a three stage plan: first fully assess their tree assets by commissioning I-tree assessments; secondly, develop an integrated Tree and Woodland Strategy as Wrexham CBC has done; and thirdly, collect and manage resources and partnerships to deliver their tree strategy. Some local authorities in Wales have started on this journey and we suggest all authorities review and adjust their priorities to ensure they meet the requirement for green infrastructure assessments in Planning Policy Wales 10 and Future Wales: The National Plan 2040 and to ensure that green infrastructure provision and management is fully embedded into their Health and Wellbeing Plans, air pollution mitigation strategies and climate emergency responses. An essential component of this will be to support suitably qualified and experienced Tree and Woodland Officers.</p> <p>Opportunities for significant new initiatives may emerge from the current thinking on a new National Forest for Wales.</p>	<p>assessment of alternatives and the emerging draft plan.</p>
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