

## Appendix A – Consultation comments and recommended Council responses.

### Local Development Framework Vision Issues & Objectives Consultation

**Newbridge Construction Ltd - 00638**

**Date Acknowledged:** 24.03.2022

**Date Received:** 23.03.2022

**00638/VIO/4/001 - Do you agree with the Vision for the RLDP? If not, how and why do you think it should be changed?**

Comment	Officer Response
<p>In general terms we agree with the RLDP vision. In new housing development such as the recently submitted candidate site (Ref: CS-0026 - Land at Glochwen, Rhiwderin), we place significant emphasis on creating new, sustainable neighbourhoods that deliver a mix of new homes to suit a range of needs, new high quality green spaces for people to enjoy and new pedestrian and cycle links which integrate with the surrounding active travel network. It is important for the RLDP to work alongside national policy documents such as Future Wales and Planning Policy Wales to ensure good design and placemaking principles are adhered to, to create accessible, sustainable, high-quality places where people want to live. Any new development should seek to benefit the wider local community through the provision of new and improvement of existing active travel to promote health and wellbeing and job creation, where possible. Outside of the commitment to deliver better places within Newport, we recognise the importance of the local economy, maximising historical and cultural assets and the protection of the existing natural environment. These are well signposted in the 'vision' and expanded on in the subsequent issues and objectives. The vision successfully captures the key challenges and opportunities that currently exist and look likely to evolve into the next plan period.</p>	<p>- Support noted. - Candidate Site assessments are being carried out as part of a separate process. The results of this assessment will be published at a later stage.</p>

**00638/VIO/4/002 - Do you agree with the issues identified? If not, how and why do you think they should be changed?**

<b>Comment</b>	<b>Officer Response</b>
<p>The projected significant increase in housing need in Wales and, particularly Newport is a critical issue that has been sufficiently identified. Latest household estimate figures for Wales highlight the ongoing trend over the last 30 years for an increase in households, mainly due to increases in one-person and two-person households, which remained the most common household types in Wales, based on these estimates. A greater emphasis should be placed on housing type and tenure when addressing housing growth. Recognising that this ongoing trend for the increase in the formation of one and two person households is likely to continue through the plan period, points to a clear need for the provision of additional smaller homes in the City to accommodate for this growth and cater for smaller households. New sites need to consider the provision of a range and mix of homes to assist in addressing the demographic and affordability challenges facing Newport, as demonstrated at Site CS-0026 - Land at Glochwen, Rhiwderin. The issue of climate change is at the forefront of all new development in Wales and its regions. It is important that we continue to make positive contribution toward addressing the causes of, and adapting to the impacts of, climate change. This can be achieved through reducing energy demand and promoting energy efficiency; developing a sustainable water strategy; aiming to use sustainable materials and minimise resource use, where possible; and the incorporation of green infrastructure, reduction of solar gain, passive ventilation, flood risk management, and sustainable drainage systems.</p>	<ul style="list-style-type: none"><li>- Support noted.</li><li>- The mix of housing types and tenure will be considered in further detail as the plan progresses.</li><li>- Candidate Site assessments are being carried out as part of a separate process. The results of this assessment will be published at a later stage.</li></ul>

**Summary of Comment 00638/VIO/4/003 - Do you agree with the Objectives for the RLDP? If not, how and why do you think they should be changed?**

<b>Comment</b>	<b>Officer Response</b>
<p>The objectives should perfectly align with the key issues facing Newport during the plan period. The starting point is growth. This agenda will be achieved by making existing places better for now and the future. Compromise is inevitable. The opportunity to improve existing places exists but will require greenfield land. Accepting this necessity enables the most otherwise sustainable outcome to be achieved. In doing so, the overall growth objective is not compromised. Development at greenfield sites located at West Newport can utilise the sustainable</p>	<p>- The need to facilitate sustainable growth is noted and recognised within the current drafting of the Vision, Issues and Objectives. This will be explored in further detail as part of the Growth and Spatial Options stage to follow.</p>

transport modes available including the rail services to Cardiff and Newport from Rogerstone and Pye Corner.	
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**Summary of Comment 00638/VIO/4/004 - Any other comments**

Comment	Officer Response
Whilst listed in the anticipated evidence base, viability and deliverability is key to the implementation of any new development. Sufficient assessment and appraisal work should be undertaken to identify significant constraints early in the process, that would have a negative effect on potential viability.	Noted.

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**Mineral Products Association - 00060**

**Date Acknowledged:** 24.03.2022

**Date Received:** 23.03.2022

**00060/VIO/4/002 - Do you agree with the issues identified? If not, how and why do you think they should be changed?**

Comment	Officer Response
Yes	Support noted.

**Summary of Comment 00060/VIO/4/003 - Do you agree with the Objectives for the RLDP? If not, how and why do you think they should be changed?**

Comment	Officer Response
The Objectives are also fairly generic, but again we support their principle. Again, we have identified in the attached letter that the objectives need to be supported by a sound evidence base to ensure the plan's aspirations are deliverable.	Support in principle noted. The consultation paper details the evidence base which will be compiled to support detailed policies and the RLDP as a whole.

**Summary of Comment 00060/VIO/4/004 - Any other comments**

Comment	Officer Response
Please see the attached letter. ---- The Mineral Products Association (MPA) is the trade association for the aggregates, asphalt, cement, concrete, dimension stone, lime,	- Note and welcome the comments on the value of the engagement events run.

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](http://www.mineralproducts.org). With reference to the above consultation and further to our previous representations, we found attendance at the recent forum event very helpful. To follow up the comments made at the event, we are supportive of the vision and the objectives, recognising that these are fairly generic, but would welcome more detail on how the aspirations of the plan will be delivered. This should be assessed as part of the evidence base to deliver policy aspirations.

From a mineral's perspective, it is imperative that mineral reserves and planning consents are delivered through the plan policies. Delivering a steady and adequate supply of raw materials will be essential to ensure growth and deliver high quality homes whilst maintaining local vernacular. The supply of minerals can not be assumed by the Council. Maintaining a steady and adequate supply of minerals will be reliant on delivering appropriate production capacity and it is important that to deliver the development aspirations of the plan, sustainable supply patterns are considered.

The Regional Technical Statement (RTS) and MTANs are important foundation documents for inclusion in the RLDP review. The RTS 2nd

- Support of vision and objectives noted. Agree that the plan and its policies need to be supported by a robust evidence base, which has been detailed within the consultation paper.
- The detailed mineral considerations raised, including the need to comply with the Regional Technical Statement and Minerals Technical Advice Note 1, will be considered in further detail when we progress to the policy development stage.
- The information provided is noted and will be discussed further if required.

Review published in September 2020 and endorsed by the Council identifies the minimum allocation needed to meet the required provision of crushed rock tonnage for Newport over the plan period. The minimum allocation should be delivered in the plan through appropriate site allocations and criteria-based policies.

The RTS requires the production of a Statement of Sub-Regional Collaboration (SSRC) to be agreed with all other constituent LPAS within the local sub-region, prior to Examination as part of the evidence base. This is essential to ensure Newport can meet its consumption of minerals and mineral products

Newport is largely reliant for its sand and gravel on marine-dredged aggregates from the Bristol Channel, imported marine wharves. The RLDP should identify all existing and potential new wharves and railheads for safeguarding, in order to provide a full range of sustainable transport options (whether or not they are currently utilised).

Although potential land-based aggregate resources are indicated within its area on BGS resource maps, many of these may be sterilised by existing built development. However, PPW requires the safeguarding of primary aggregate resources and resources of both crushed rock aggregates and land-based sand & gravel should be safeguarded within the RLDP in accordance with the British Geological Survey's safeguarding maps, or such other geological information as may be available and suitable for this purpose. This will be more apparent as there is greater pressure to release greenfield sites for other competing developments and the council must therefore consider prior extraction where known mineral resources may be sterilised. It is also important to ensure the mineral safeguarding policies are robust and properly understood as the current AMR suggests there is a need for more training when dealing with applications affecting MSAs.

Finally, the evidence base should give due consideration to the preparation of a resource assessment and consider supply chain options to ensure the plan is deliverable and the management of natural resources is sustainable.

We trust the above information is helpful, however, please do not hesitate to come back to me if you have any questions.

**00060/VIO/4/001 - Do you agree with the Vision for the RLDP? If not, how and why do you think it should be changed?**

<b>Comment</b>	<b>Officer Response</b>
Although fairly generic, we are supportive of the vision. However, we have identified in the attached letter that the vision needs to be supported by a sound evidence base	Support noted. The consultation paper details the evidence base which will be compiled to support detailed policies and the RLDP as a whole.

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**Farmers Union Wales - 00057**

**Date Acknowledged:** 28.03.2022

**Date Received:** 28.03.2022

**Summary of Comment 00057/VIO/1/001 - Do you agree with the Vision for the RLDP? If not, how and why do you think it should be changed?**

<b>Comment</b>	<b>Officer Response</b>
The Farmers' Union of Wales supports the vision for a city that attracts business that focuses on sustainable, innovative and technologically leading practices. We also agree that the RDLP should promote and protect cultures and languages across the City and sustainably manage natural resources in a climate responsible manner. We believe that supporting and protecting family farms across Newport is key to achieving such goals and that agricultural sustainability should be associated with economic sustainability. Given that livestock grazing often improves the biodiversity of landscapes, and those who speak Welsh within the agriculture category make an essential contribution to the preservation of the language, preserving Newport's family farms are imperative to creating a vibrant, diverse and sustainable city.	Support noted.

**00057/VIO/1/002 - Do you agree with the issues identified? If not, how and why do you think they should be changed?**

<b>Comment</b>	<b>Officer Response</b>
How can the plan improve access to the countryside for recreation?	How can the plan improve access to the countryside for recreation?

The FUW recognises the importance of access to the countryside for recreation and we want the public to enjoy the countryside. This does however have to be in tandem with public awareness of issues such as livestock worrying and trespassing. Therefore, in order for the public to enjoy the countryside whilst protecting farm businesses from severe financial and emotional stress, we would encourage the RLDP to also consider how to improve public awareness of mitigations to these incidents e.g. keeping dogs on leads, following public footpaths.

How can we ensure rural development does not contribute towards further increases in unsustainable travel patterns?

The lack, or reduced availability, of public transport provision across rural areas often leaves individuals with no alternative to travelling long distances in their own vehicles. In order to ensure unsustainable travel patterns are not increased by development, the Plan must supply a sustainable and practical alternative.

How can the plan support and create circular communities that is the focus on local resilience in terms of social (food production and distribution) economic (sustaining local jobs) environmental (waste reduction and increased recycling and cultural (shift to active travel, repairing goods, zero waste shopping etc.)?

Agricultural land should be protected in order to maintain levels of food production and employment in the industry. By improving levels of local food procurement, the plan can also create circular communities by supporting local farm business and the rural economy, reducing food miles, whilst ensuring the food procured is healthy and sustainably produced. It also provides an opportunity, particularly in the procurement of school food to educate the public on where and how their food is produced.

How can the plan ensure good quality agricultural land is well utilised and protected?

Good quality, agricultural land is best utilised in agriculture. In a number of cases livestock grazing has shown to improve biodiversity, carbon is sequestered in soils and hedges. Woodland management and where appropriate tree planting can also aid this. Agriculture is part of the

- The challenges described are noted, however the detailed measures recommended would likely fall outside the scope of what the RLDP can reasonably prescribe. Further consideration will be given to what level of influence the plan can have in managing this issue through policy development.

How can we ensure rural development does not contribute towards further increases in unsustainable travel patterns?

- Our Travel and Movement Objective acknowledges this need and will be considered further accordingly.

How can the plan support and create circular communities that is the focus on local resilience in terms of social (food production and distribution) economic (sustaining local jobs) environmental (waste reduction and increased recycling and cultural (shift to active travel, repairing goods, zero waste shopping etc.)?

- The creation of circular communities will be facilitated by sustainable development. This equally applies to communities in the countryside and will be considered as the plan development progresses.

How can the plan ensure good quality agricultural land is well utilised and protected?

- Information noted. Further advice will be sought once we commence policy development.

<p>solution to achieving net zero, and increasing biodiversity. By protecting agricultural land from development, we are also protecting the contribution of family farmers to the rural community.</p>	
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**00057/VIO/1/003 - Do you agree with the Objectives for the RLDP? If not, how and why do you think they should be changed?**

<b>Comment</b>	<b>Officer Response</b>
<p>The FUW agrees with the objectives of valuing and promoting Newport's culture and the Welsh language, sustainably managing the natural resources in Newport to meet the needs of present and future communities, by ensuring resource efficiency, improved health outcomes, and the creation of a successful circular economy and green growth. Furthermore, we also agree that development and land uses should be resilient and tackle the causes of climate change. Welsh agriculture, firstly must be supported and protected in order to ensure our food security remains at least at the current level. By encouraging the public procurement of such produce, you are supporting local farm business, ensuring the procurement of sustainable, healthy food, supporting rural communities and therefore creating a successful circular economy. As such, we believe protecting Newport's agricultural land and supporting family farms in the area will contribute to meeting these objectives.</p> <p>The plan acknowledges that the protection of agricultural land and soil will directly impact on the level of food production, drainage, water quality and quantity, ecological resilience as well as the source of sustainable building materials. Although it notes that Newport's agricultural land is "mostly lower quality" and that "there are important choices to be made as to how to use this land sustainably." Farming, as referred to above, offers many solutions to achieving net zero and sustainably managing our landscapes, whilst also producing healthy, sustainable food and contributing to the local economy and communities. Furthermore, as acknowledged in the RLDP, resources are finite and therefore the loss of agricultural land and in turn communities, should be avoided.</p>	<p>Support noted. Welcome the information provided. Further advice will be sought as the plan development progresses.</p>



**00057/VIO/1/004 - Any other comments**

<b>Comment</b>	<b>Officer Response</b>
Given that the proposals are generic and do not refer to specific areas or locations of land, it is difficult to make more thorough suggestions on how best to protect and utilise such land. However, when the Plan has more specific details available, the FUW is very keen to engage on how best to utilise agricultural land and support the rural economy, in turn contributing to achieving the objectives of the RLDP.	Noted. We welcome further involvement as the plan progresses and look forward to future advice.

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**Caerleon Civic Society - 00034****Date Acknowledged:** 28.03.2022**Date Received:** 25.03.2022**00034/VIO/3/001 - Do you agree with the Vision for the RLDP? If not, how and why do you think it should be changed?**

<b>Comment</b>	<b>Officer Response</b>
The Vision for the RLDP is broadly agreed.	Support noted.

**00034/VIO/3/002 - Do you agree with the issues identified? If not, how and why do you think they should be changed?**

<b>Comment</b>	<b>Officer Response</b>
The key issues are generally agreed, particularly in relation to the role of greenfield sites, air quality, public transport and active travel and the historic environment and landscape.	Support noted.

**00034/VIO/3/003 - Do you agree with the Objectives for the RLDP? If not, how and why do you think they should be changed?**

<b>Comment</b>	<b>Officer Response</b>
The objectives for the RDLP are generally agreed.	Support noted.

**00034/VIO/3/004 - Any other comments**

<b>Comment</b>	<b>Officer Response</b>
Whilst generally agreeing with the key issues and Objectives, we are particularly concerned about the consequences of a continued rapid	Concerns are noted. These matters will be further explored as the plan progresses and further comments at that stage are welcomed.

rate of growth for communities like Caerleon which will depend on a high level of sustainability being achieved in relation to any future large scale development. Air Quality, flood prevention, and protection of the historic and natural environment will be of greatest concern at the Preferred Option stage.

**Associated British Port - 00435**

**Date Acknowledged:** 28.03.2022

**Date Received:** 25.03.2022

**00435/VIO/1/001 - Do you agree with the Vision for the RLDP? If not, how and why do you think it should be changed?**

Comment	Officer Response
<p>ABP agrees with the overall vision and can confirm that its Newport Docks are a long-established operation and a very significant economic and commercial asset to the City providing a wide variety of port related facilities and jobs. Support is therefore given to the vision and that fact that the Council recognises the economic importance of the Docks as a key issue for the Replacement Local Development Plan (RLDP) and it is hoped that as the detail of the RLDP emerges it will support ABP to improve and expand its facilities in order that it can further contribute to the economic wellbeing of the City. It should be noted that in addition to the role the Docks play in bulk handling and warehousing and storage facilities, ABP are also actively looking to develop energy and infrastructure projects within its landholdings in support of the RLDP objectives for climate change. ABP can therefore confirm its general support for the overall vision and objectives in this regard and would be glad to discuss with officers its aspirations in order to ensure that they are fully integrated in the RLDP going forward.</p>	<p>Support noted. We welcome further involvement as the plan progresses and look forward to future discussion.</p>

**00435/VIO/1/002 - Do you agree with the issues identified? If not, how and why do you think they should be changed?**

Comment	Officer Response
<p>As above, ABP supports the fact that the Council recognises the economic importance of Newport Docks as a key issue for the RLDP and it</p>	<p>Support noted. We welcome further involvement as the plan progresses and look forward to future discussion.</p>

<p>is hoped that, as the detail of the RLDP emerges, it will support ABP to improve and expand its facilities in order that it can further contribute to the economic wellbeing of the City. It should be noted that in addition to the role the Docks play in bulk handling and warehousing and storage facilities, ABP are also actively looking to develop energy and infrastructure projects within its landholdings in support of the RLDP objectives for climate change. ABP can therefore confirm its general support for the overall vision and objectives and issues in this regard and would be glad to discuss with officers its aspirations in order to ensure that they are fully integrated in the RLDP going forward.</p>	
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**00435/VIO/1/003 - Do you agree with the Objectives for the RLDP? If not, how and why do you think they should be changed?**

Comment	Officer Response
As above.	Support noted. We welcome further involvement as the plan progresses and look forward to future discussion.

**00435/VIO/1/004 - Any other comments**

Comment	Officer Response
N/A.	N/A.

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**The Theatres Trust - 00112**

**Date Acknowledged:** 28.03.2022

**Date Received:** 25.03.2022

**00112/VIO/1/001 - Do you agree with the Objectives for the RLDP? If not, how and why do you think they should be changed?**

Comment	Officer Response
We are supportive of the Objectives outlined, in particular that the needs of Newport are supported by necessary social and cultural infrastructure.	Support noted.

**00112/VIO/1/002 - - Any other comments**

Comment	Officer Response

<p>We recommend the Local Development Plan contains policy which supports Newport's valued cultural facilities and guards against unnecessary loss.</p>	<p>Noted. This will be further explored as part of the Population and Communities; and the Equality, Diversity and Inclusion Objectives as the plan progresses.</p>
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**Mr R Herbert - 00174**

**Date Acknowledged:** 25.03.2022

**Date Received:** 25.03.2022

**00174/VIO/4/001 - Intro**

<b>Comment</b>	<b>Officer Response</b>
<p>We set out herein our Client's response to the Newport Local Development Plan Draft Visions, Issues and Objectives consultation paper. Our client, Mr Herbert, owns two sites that are being promoted for development through the LDP and these have been submitted as candidate sites to help deliver the Council's future Plan. Mr Herbert is pleased to be able to have the opportunity to feed into the early stages of the plan preparation process and hopes that our input is helpful in informing the key components of the Plan.</p> <p>We have previously submitted candidate sites for consideration on Mr Herbert's behalf at South and West of Bettws and Risca Road, Rogerstone.</p> <p>Summarily, the site at Bettws is capable of delivering c.450 high quality homes (c.12.5Ha), including specialist housing for the elderly, selfbuild and affordable housing. In addition it can provide c.1.5Ha (6,000 to 8,000 sq.m) of employment and community uses (mixed uses) in order to help enhance self-containment and boost the local economy whilst providing onsite space for community groups, classes and clubs etc. The site provides a significant opportunity for long term sustainable development, investment and enhancement of Bettws which would be both deliverable and viable.</p> <p>The second site submitted at Risca Road, Rogerstone, can accommodate up to 20 dwellings. It is considered that this can provide self-build</p>	<p>Noted. However, Candidate Site assessments are being carried out separately to this process, and the results of this assessment will be published at a later stage.</p>

<p>units but consideration could also be given to other types of dwellings such as for the elderly or a small scale developer.</p> <p>Our Client is in discussions with prospective house builders and housing associations in respect of both sites and would welcome discussions with the Council on each of the sites on how they can contribute towards the Plan. Indeed, our client is keen to demonstrate that both sites would be deliverable, viable and sustainable such that they can provide a timetable for delivery to feed into the Council's trajectory both in terms of private and affordable homes. Whilst initial work on ecology, landscape, transport and capacity has been undertaken, an early meeting with the Council would assist with planning further work that is required on each of the proposals.</p> <p>Our Client's response to the Issues paper is set out below and is to be considered against their overarching role which is to assist the Authority in meeting its housing needs.</p>	
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**00174/VIO/4/002 - Do you agree with the Vision for the RLDP? If not, how and why do you think it should be changed?**

<b>Comment</b>	<b>Officer Response</b>
<p>Please refer to the attached additional information Attached Letter:</p> <p>We are broadly supportive of the vision for Newport, it is a significant City that will need to play its part in the future success of Wales. Indeed, its role will be vital as the gateway City in ensuring a robust economic and social recovery as restructuring continues post Covid, Post Brexit and with the energy crisis faced. Indeed, as stated in the Vision document Newport has some of the poorest and wealthiest communities in Wales and it is therefore appropriate that reducing inequalities is a core element of the vision.</p> <p>We believe that meeting peoples' housing needs and ensuring provision of affordable and sustainable new homes should be explicitly stated as part of the vision. Indeed, building new homes has always been a core element of economic recovery strategies and it can play a</p>	<p>Support noted. We believe the vision as currently drafted appropriately captures the points raised, recognising that sustainable development encompasses more than just housing. Housing specifically is addressed at the Objective stage where more targeted measures can be implemented to meet the various needs of Newport. Further consideration will be given to these points at the policy development stage.</p>

significant role in the future of the economy not just in terms of matching jobs to homes but also in the direct and indirect spin offs for the construction sector. Indeed, the delivery of new homes in appropriate locations through the LDP has been a core tenet of the success of the existing Plan and the Council should be commended for helping to facilitate this. These levels of growth have demonstrated that the right sites in the right locations can ensure Local Development Plans are successful. However it is recognised that completions have fallen slightly behind the level required in the LDP which emphasises the value of finding and allocating appropriate sites in the right location. Indeed, we believe that the success of the LDP can be replicated if this is achieved. Planning Policy Wales (PPW) is clear that the planning system must "identify a supply of land to support the delivery of the housing requirement to meet the differing needs of communities across all tenures". Our client believes that this must form a key component of how the authority will look in 15 years. In addition, we believe that the Council should make a commitment to protecting residents from the potential wider impacts of macro economic problems upon society and the economy- whilst the extent of changes is unknown it is likely that the plan will need to ensure a flexible approach to ensure the delivery of development proposals.

**00174/VIO/4/003 - Do you agree with the issues identified? If not, how and why do you think they should be changed?**

Comment	Officer Response
<p>Please refer to the attached additional information Attached Letter:            We would note that Wales as a whole is facing its most significant challenges for some considerable time and it is without question the case that the Replacement LDP is being prepared under some of the most challenging societal and economic conditions since World War Two.            The following issues overlap a number of the main objectives and we believe that the Plan must address these in a cohesive and coherent</p>	<p>- The challenges described are noted and will inherently influence the development of the plan. The plan will be based on this context and that forecasted for the next 15 years to cover the lifespan of the plan.            - Many of the other points raised will be explored in further detail as part of the Growth and Spatial Options stage to come.</p>

strategy. Indeed, positive planning interventions are required in order to help address these issues.

Post Covid 19 recovery, energy crisis and Brexit

Under a number of the objectives reference is made to post Covid and Brexit Recovery, in addition the impacts that the energy crisis will have upon this and our communities ought to be recognised. Indeed, over recent years we have experienced exceptional circumstances that have the potential to severely and drastically impact upon the economy and society as a whole. The planning process can make a significant contribution towards helping to facilitate the economic recovery that is needed. Plainly economic recovery must form an over-riding requirement of the Plan and without question must underlie the approach to be taken.

Constraints in adjoining Authorities

We are surprised that there has been no mention of the significant housing supply constraints in adjoining Authorities. Newport has not just been dealing with its own needs in recent years and accordingly needs to consider the offsets from new homes not being provided in its neighbouring authorities. Whilst housing land supply requirements were formally abandoned by the Welsh Government it does not change the record of poor delivery elsewhere and it follows logically that where needs aren't met within an Authority they will need to be accommodated elsewhere. Whilst this is an unsatisfactory and unsustainable position there is unlikely to be any change in this in the short term. Indeed:

\* Torfaen & Caerphilly - as of April 2021 there was a cumulative shortfall across the two Authorities of over 4,000 dwellings from the levels envisaged within their respective Local Development Plans. This represents the number of households that could not be provided for in those respective Authorities. This is a shortfall of national significance and the lack of supply has had a profound effect on house prices across the region.

\* Monmouthshire - representations made in 2021 by the Welsh Government on the Monmouthshire LDP mean that further new housing

- Candidate Site assessments are occurring separately from this process. The outcome of those assessments will be published at a later stage in the process.

allocations would not be needed in Monmouthshire. Given the additional constraints in Monmouthshire, including Phosphates, it is likely that demand will be displaced from Monmouthshire to adjoining Authorities.

Plainly, policy and supply constraints in adjoining Authorities will have a significant impact upon Newport City Council in respect of the housing market and affordability issues. This is a challenge that the LDP will need to consider how it responds to.

#### Meeting needs

It will be of utmost importance to ensure Newport establishes a level of growth that meets needs and does not exacerbate the existing supply constraints in South Wales, taking into consideration the shortfalls in adjoining Authorities alongside Newport's own needs. We believe that a high level of growth will need to be set in order to meet the Vision and fulfil the strategic aspirations for Newport as a Gateway City to Wales.

In this regard we consider:

- o Given the potential impacts of Covid 19 on the economy and society, there will be a need to adopt a highly ambitious strategy which provides far greater flexibility to respond to the crisis through added stimulation of the construction sector;
- o Account should be taken in the baseline figures of the levels of sustainability and self-containment that can be achieved through embracing working from home trends for those sectors where it is feasible. These are often the high level added value jobs that are no longer tied to cities such as Bristol or Cardiff but can retain expenditure in the local area and encourage vibrant local areas;
- o Any requirement should ensure an appropriate level of flexibility for delivery indeed, it may be that a 20% flexibility allowance or greater provides an appropriate starting point; and
- o It is likely that in addition to the flexibility allowance, a "non-implementation" allowance of the land bank will also need to be applied. We will comment on this further when detailed information becomes available.

#### Addressing affordability



The Council's result in nearly achieving its affordable housing target for 2015-2020 is to be welcomed. However, the Council recognise that this is only a small proportion of the actual level of need. The latest Local Housing Market Assessment (LHMA) indicates that "as of the 31st March 2017 there were 6,838 households with active applications on the housing waiting list. In order to clear this backlog during the 5 year life of this LHMA we would need to allocate 1,368 units of accommodation each year". The final stated annual shortfall is 559 per annum which equates to 2,795 over the 5 year period. This is plainly a significant issue within the Authority which has no doubt been exacerbated by price increases that have been fuelled by shortages of housing supply outside of the County.

Our Client is of the view that the replacement LDP provides an opportunity to seek to address affordability in a meaningful and substantive way.

#### Sustainable urban extensions

Our Client is of the view that it will be important to consider all scales of potential development from minor rounding off of settlements and infill to sustainable urban extensions. Indeed, the Welsh Government's guidance, "Building Better Places" actively seeks to achieve rounded communities based on the underlying principles of place making.

The Town and Country Planning Association (TCPA) indicates that the full range of planning solutions should be available to communities in order to achieve "the most sustainable pattern of development locally". Guidance set out by the TCPA indicates that holistically planned urban extensions can enhance the natural environment and offer high-quality affordable housing and locally accessible work in beautiful, healthy and sociable communities. Such interventions could be exemplars in sustainability and energy efficiency.

The TCPA also note that "Major planned developments such as ....urban extensions provide an opportunity to design-in the greenest of technologies and infrastructure from scratch, in ways that are not possible in smaller infill schemes". Such schemes can set a benchmark in

quality and approach that can lead the way for smaller schemes elsewhere in the Country.

Appropriately sized and scaled urban extensions provide the opportunity for new development to positively address existing issues by creating a planned environment to suit and cater for a critical mass of population, services and facilities. These can:

- o include a variety of housing types, tenures and densities along with neighbourhood centres with mixed uses and a range of facilities;
- o provide a landscape structure that builds on existing assets, including green infrastructure within the development, linking urban areas to the countryside beyond and creating a distinctive edge to the urban area;
- o provide opportunities for people to work locally and for small businesses to set up, grow and thrive;
- o present an opportunity to design energy efficient communities;
- o allow pedestrian, cycle and public transport networks to be fully integrated, often improving services available to the adjacent communities, increasing health and well-being by reducing the reliance on cars; and
- o support the surrounding communities by offering facilities not available locally and by providing affordable housing for people in the care and support sectors they can ensure that the elderly can continue to live independently amongst friends and family reducing the costs of providing social and nursing care.

These concepts are best delivered through consideration of longer term time horizons and wider geographical areas so that the benefits of strategic solutions are explored. The alternative of short term, small scale, incremental and dispersed change will not yield the same overall benefits.

Importantly, by applying a coherent and distinctive urban design concept and master planned approach that combines innovative solutions and reflection of local characteristics, such extensions can provide the opportunity to create a new development that has a strong local identity. This will facilitate effective integration with the existing community for whom there should be major benefits particularly in relation to

supporting the existing economy and creating jobs but also in the provision of a range of housing sizes, styles and tenures to accommodate those currently priced out of the local housing market. This accords with a wide range of national planning policy requirements.

#### Sustainable growth locations

Largely as a result of the success of the previous Local Development Plan it is inevitably the case that the supply of brownfield sites in Newport for redevelopment for residential purposes is limited. As such, the Council will need to consider sustainable and appropriate greenfield locations based around existing communities. In reality this is likely to focus on the western and north western parts of the County extents associated with existing built form, local transport hubs (railway stations) and established sustainable communities. Indeed, we are of the view that the LDP must not neglect the requirements of these existing communities in favour of more remote areas on the Eastern side of the City that would be more aligned to commuting patterns along the M4.

It is anticipated that such focal points for proportionate growth include a number of existing communities where there are a number of local facilities that can provide an opportunity to maximise levels of self-containment and sustainability. Indeed, proportionate growth can help to reinforce existing levels of sustainability but also seek to provide additional facilities and uses that can move to a greater level of neighbourhood and community well-being. In this regard, our clients consider that Bettws and Rogerstone are suitable locations to accommodate further sustainable growth.

#### Bettws

Our Client controls a large area of unconstrained land immediately adjoining the southern and western settlement boundary of Bettws. It offers a number of potential ways in which it could contribute to meeting needs and placemaking. It provides the potential to help deliver a significant number of homes and job opportunities for local people as noted earlier. Indeed, this is an opportunity to help to create a more

sustainable self-contained community that could offer a range of land uses including residential, employment, community, recreation and commercial. This could help to create a 21st century neighbourhood in which all of the residents' everyday needs could be met within walking/cycling distance.

The sustainable site

Our Client's site extends from the Llwynhaid Farmyard Courtyard in the west and wraps around the settlement towards the former comprehensive school redevelopment site from which is separated by two fields which would also be suitable for development. It is crossed by Henllys Lane and Bettws Brook in east/west direction and by Parc-y-Brain Road in a north/south direction.

To the north the site is bound by the existing settlement, and the southern boundary is defined by the adjoining woodland and fields which also form part of the western boundary. The eastern edge is formed by trees and the fields separating the site from the new housing on the former School site. Given its extent it is very well contained by both physical and natural boundaries and has limited visibility in the wider context. Bettws is a well established, stand-alone local community that is popular with extended family groups and this proposal would offer opportunities to increase the variety of housing, freeing up larger properties and providing for ageing residents as well as new affordable housing for the younger generations in close proximity to excellent education facilities.

The offer

The site is capable of delivering c.450 high quality homes (c.12.5Ha), including specialist housing for the elderly, self-build and affordable housing. In addition it can provide c.1.5Ha / 6000 to 8000 sq.m of employment and community uses (mixed uses) in order to help boost the local economy and provide onsite space for community groups, classes and clubs etc. being served by existing bus routes. It forms a significant opportunity to provide investment in these facilities and to increase the level of selfcontainment of Bettws through providing new homes and other land uses that could add to the level of local facilities. The site is within easy

walking distance of several bus stops served by regular bus routes, typically 20 minute frequency, to and from Newport running along Monnow Way. These services would be within 400 metres of the proposed development areas but a bus route could be diverted to run through the site. In addition, the canal towpath to the east of the site offers an easy and pleasant foot/cycle path route into the City Centre, which is approximately 4km in distance as well as to Cwmbran and more distant locations.

In the centre of Bettws there are a number of local facilities, including shops, a Spar shop, post office, newsagent and hairdresser as well as several denominations of church, a library, a health centre, chemist, dental surgery and local police station, all within close proximity. The demand for retail units within the local centre rose significantly during lockdown with residents making more use of local facilities.

Furthermore, Monnow Primary School is approximately 400m away and Newport High School within 750m of the site. There is also a local Welsh speaking primary at Ysgol Gymraeg Ifor Hael. Additionally Bettws has a number of sports grounds, playing fields and a leisure centre (active living centre associated with the High School).

**Sustainable neighbourhood planning**

The location and size of the site, means that it provides a unique opportunity to enhance the local neighbourhood. It would add to the mix of housing, the range of facilities and services and indeed the overall sustainability of the community.

Whilst development on the edge of settlements can be a sensitive issue, by taking a landscape led approach the design suggested has sought to ensure that the proposed development will balance the need for growth with the creation of accessible open space and interconnected Green Infrastructure that maximises biodiversity and which promotes access to recreation space for the settlement as a whole.

The early concept proposals that have been submitted to the Council demonstrate that proposed development has been guided to lower

lying land, areas that possess natural vegetative screening, and which benefit from intervisibility with the existing urban area. In these areas development will work with the site's topography and existing landscape features, such as hedgerows and Public Rights of Way, to create a new neighbourhood that respects the grain of the landscape and which can sensitively integrate development into its context.

Development on higher, more exposed areas which are visually separated from the existing urban area will not take place, and instead these areas will be utilised for parkland and open space. Moreover, development will ensure that all new houses will have easy access to open space, opportunities for play and a network of new footpath and cycle routes linking east to west and north to south. These routes will ensure connectivity to the existing urban area as well as promoting access to the wider countryside.

Community uses, specialist housing for the elderly and local employment uses will all be explored to ensure that this development supports the local economy and promotes social cohesion. The development will create an interconnected network of both green and blue infrastructure. This will include new woodland and meadow creation, wetland establishment and a comprehensive Sustainable Drainage System. The development will target a significant Biodiversity Net Gain.

It is considered that the community will benefit from the significant investment and opportunities that an extension located at Bettws would bring. Indeed, Bettws is itself a sustainability community with a range of shops, schools and facilities and is very well served by public transport. However, it is in need of investment and opportunities in order to help reduce localised inequalities, there is a significant opportunity to increase the level of self-containment of Bettws through providing new homes and other land uses that could add to the level of local facilities.

#### Summary

It provides the opportunity to contribute towards the vision and objectives, as well as addressing many of the issues raised. Indeed, the

location of growth can help with the creation of a new 21st century neighbourhood for Bettws that ensures 'good growth' by balancing development with Green Infrastructure, and which positively plans for social infrastructure from the initial masterplanning stage. Proposals can work with the landscape in order to effectively integrate a new neighbourhood into both Bettws and its local context. A comprehensive approach to the site's planning; including consideration of access, open space, public transport and biodiversity will continue to evolve the proposals and the landowner is committed to working with the local authority and wider community as proposals develop.

Rogerstone

Our Client also controls land at Risca Road, Rogerstone. The site is approximately 1ha in size and broadly rectangular in shape. It is located immediately adjoining the north western extent of the settlement boundary for Rogerstone. It is a former allotment garden that was neglected and became uneconomic with the occupier serving notice to quit and vacating, leaving the site degraded in its quality. To the south the site adjoins Risca Road. To the east is housing fronting Risca Road, beyond which is further residential development.

The site occupies a highly sustainable location and residents would be well placed to benefit from easy access to existing local services as well as wider facilities through walking, cycling and public transport. The Monmouthshire and Brecon Canal to the north of the site links into wider recreational and functional walking and cycling routes.

Importantly the site lies within 700m walking distance of Rogerstone Railway Station which is one of the few South Wales Metro rail connections within Newport - a focal point around which new development should be encouraged. It means that future residents of the site would be within five minutes walking/cycling distance of a transport service that links to, Cardiff, Ebbw Vale, and beyond (to Swansea, Bristol, London and the Midlands) with recent additional connections to Newport too. Furthermore, regular bus services run along Risca

Road providing links between Newport and Risca/Pontymister as well as between Newport and Blackwood.

The site is within easy walking and cycling distance of a good range of facilities. These include supermarkets at Afon Village and Pontymister/Risca, a post office, various shops, restaurants, places of worship, recreation (the Rogerstone Welfare and Afon Village community centre / Muga, Rivermead) and employment areas such as the Wern, Tregwilym and Pontymister industrial / trading estates as well as Cleppa Business Park.

Rogerstone Primary School (2200m), Jubilee Park (2000m) and Mount Pleasant Primary Schools (1500m), and Bassaleg Secondary School (2.8km) are also conveniently located to the site along with the Risca Community Comprehensive School (Pontymason Lane) (500m) which has a leisure centre alongside.

The wide array of local facilities affords an opportunity for future residents to maximise the proportion of their everyday lives within their local neighbourhood without relying upon the need for private car trips. Indeed, everyday needs can be catered for in the local neighbourhood and more strategic trips (for instance to the centre of Newport or Cardiff) can be made via the South Wales Metro system, reaching such destinations within ten to 20 minutes and reducing the need to travel by car.

It is considered an appropriate location for the provision of proportionate growth that would complement existing facilities provide more opportunities for local people to remain in the area.

Importantly it would contribute to addressing a number of the issues set out within each of the draft Objectives in particular by virtue of the fact that it would be providing homes in a sustainable location that is well linked to existing facilities and both active and public transport networks. The site presents an opportunity:

1. To provide plots for high quality self-build homes for local people helping to support the rich mix of uses and house types required. This will meet a significant need that is not currently well catered for. It will help provide homes for families for life;



<p>2. To support and enhance existing facilities and services through providing homes in an appropriate location;</p> <p>3. To provide an opportunity to focus development around the existing train station which acts as a hub where such intensification is entirely appropriate and sustainable, helping to create a move away from reliance upon the private car;</p> <p>4. To capitalise on its location in close proximity to the canal to the north and the associated recreational benefits;</p> <p>5. To increase access to other formal recreation utilising the wide range of existing facilities located nearby including the Multi Use Games Area (MUGA) at the Rivermead Centre, Risca Leisure Centre, Newport Golf Club and Rogerstone Welfare as well as the cricket clubs at High Cross, Whiteheads and Pontymister cricket and bowls facilities;</p> <p>6. To enhance the entrance into both Rogerstone and Newport from Caerphilly in the north. Indeed, the site can become an attractive gateway into the Authority;</p> <p>7. To adopt an approach to design that reflects the traditional local character, density and appearance; and</p> <p>8. To make appropriate use of a former allotment site to provide a betterment in terms of green infrastructure and biodiversity through enhancements on site and off site if required.</p>	
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**00174/VIO/4/004 - Do you agree with the Objectives for the RLDP? If not, how and why do you think they should be changed?**

<b>Comment</b>	<b>Officer Response</b>
<p>Please refer to the attached additional information Attached Letter: In general terms we are supportive of the overall approach towards the objectives, however, we believe that particular attention is needed with regards to economic and population / community objectives. As we have stated earlier, there are significant challenges ahead and f the planning process can fulfill an important role in helping address these issues rather than constrain recovery and realignment.</p>	<p>Support noted. Economy and Employment: - We believe that the Objective as currently drafted appropriately accommodates the points raised. Further consideration will be given to more specific matters as policy development progresses. Population and Communities:</p>

We are strongly of the view that well planned urban extensions can contribute towards a range of the key objectives not just in respect of population and communities, inclusive of:

- o facilitating a variety of housing types, tenures and densities along with neighbourhood centres with mixed uses and a range of facilities.
- o providing a landscape structure that builds on existing assets, including green infrastructure within the development, linking urban areas to the countryside beyond and creating a distinctive edge to the urban area.
- o providing opportunities for people to work locally and for small businesses to set up, grow and thrive.
- o presenting an opportunity to design energy efficient communities.
- o allowing pedestrian, cycle and public transport networks to be fully integrated, often improving services available to the adjacent communities, increasing health and well-being by reducing the reliance on cars
- o supporting the surrounding communities by offering additional or improved facilities not currently available locally and by providing affordable housing for people in the care and support sectors they can ensure that the elderly can continue to live independently amongst friends and family reducing the costs of providing social and nursing care.

With regards to specific objectives:

Economy & Employment -

We are supportive of the approach towards employment land in general and the principles of the objective. However, as stated previously it is clear that economic restructuring and re-alignment will be a significant aspect of the Replacement Plan period. Flexible and innovative ways of approaching this will be required. Indeed, there has already been a shift in recent years in employment patterns and requirements, as such we would expect numerous trends to be reflected in the strategy. For example:

- o working from home is a key change with the Welsh Government seeking to achieve 30% of the workforce working from home, this has opportunities for local sustainability but also for larger centres such as Newport City Centre that will need to be considered. This will require additional local support and infrastructure to enable people to work remotely.

- The Vision and Objective as currently drafted already reflect Newport's role as a National Growth Area. The Growth and Spatial Options stage will explore in further detail the matters raised.

o there should be some recognition of non office based home working needs such as in respect of tradespersons (eg plumbers, carpenters etc) workshop and storage arrangements.

o Non B-uses ought to be considered as an important means of achieving employment requirements; and

o a significant amount of economic restructuring has already taken place over the past two years, particularly in respect of the need for more warehousing and distribution facilities associated with home deliveries, online retail and Brexit arrangements. South Wales has traditionally lost out on investment opportunities associated with such uses (given the facilities available at Severnside) however, it is considered likely that Newport will need to accommodate such uses to capitalise upon opportunities and to complement its approach to sustainability.

#### Population & Communities

As stated previously our Client is strongly of the view that it will be important to ensure a suitable supply of housing land is identified in order to meet needs. Indeed, it will be of utmost importance to ensure Newport establishes a level of growth that meets needs and does not exacerbate the existing supply constraints in South Wales. Rather we are of the view that a high level of growth will need to be set in order to meet the Vision and fulfil the strategic aspirations for Newport as a Gateway City to Wales. In this regard it is noted:

o given the potential impacts of Covid 19 on the economy and society, there will be a need for a highly ambitious strategy to be adopted which provides far greater flexibility to respond to the crisis through added stimulation of the construction sector; and

o account should be taken in the baseline figures of the levels of sustainability and self-containment that can be achieved through embracing working from home trends for those sectors where it is feasible. These are often the high added value jobs that are no longer tied to cities such as Bristol or Cardiff but can retain expenditure in the local area and encourage vibrant local areas including supporting Newport as a City in its own right.

<p>o Careful identification of suitable locations for new development will have a vital role in supporting the continued regeneration of Newport as an important City Centre rather than supplementing the success of other cities.</p>	
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**Summary of Comment 00174/VIO/4/005 - Any other comments**

<b>Comment</b>	<b>Officer Response</b>
<p>Please refer to the attached additional information Attached Letter: We can confirm that our Client has secured interest from house builders and housing associations who have offered to refine development proposals for both sites should they be found suitable. However, our Client would welcome early engagement with the Council on whether they consider the sites proposed could play an important role in the delivery of sustainable communities through the replacement LDP.</p>	<p>Candidate Site assessments are occurring separately and any discussions necessary will be undertaken as part of that process.</p>

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**The John Family - 00169**

**Date Acknowledged:** 25.03.2022

**Date Received:** 25.03.2022

**00169/VIO/3/001 - Intro**

<b>Comment</b>	<b>Officer Response</b>
<p>We set out herein our client's response to the Newport Local Development Plan Draft Visions, Issues and Objectives consultation paper. Our client, the John Family, owns land at Cwrt Camlas, High Cross, that has been promoted for development through the LDP. Our clients are pleased to be able to have the opportunity to feed into the early stages of the plan preparation process and hopes that our input is helpful in forming the key components of the Plan. Summarily, our client's site is 2.91 ha in size and is situated to the northwest of Junction 27 of the M4 and comprises grazing land. A master planning exercise has been undertaken with input from a perspective developer and housing association that demonstrates it can potentially</p>	<p>Noted. However, Candidate Site assessments are being carried out separately to this process, and the results of this assessment will be published at a later stage.</p>

<p>accommodate c. 70 dwellings. Development of the site will also provide potential improvements to facilities associated with the adjoining Children's Centre given its increasing importance as a resource for the local area. To the south the site immediately adjoins the recently constructed Serennu Children's Centre and housing estate of Cwrt Camlas and is bound to the west by existing housing on Cwm Lane. The northern boundary of the site is defined by Pensarn Farm Lane, whilst the eastern boundary is defined by hedgerows separating the site from further grazing land which is also in the ownership of our clients.</p> <p>Prospective housebuilders and housing associations have fed into the submitted proposals and our clients would welcome discussions with the Council on the contribution that the site can make towards the Plan. Indeed, our client is keen to demonstrate that the site would be deliverable, viable and sustainable such that they can provide a timetable for delivery to feed into the Council's trajectory both on terms of private and affordable homes.</p> <p>Our client's response to the Issues paper is set out below and is to be considered against their overarching role which is to assist the Authority in meeting its housing needs.</p>	
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**00169/VIO/3/002 - Do you agree with the Vision for the RLDP? If not, how and why do you think it should be changed?**

<b>Comment</b>	<b>Officer Response</b>
<p>Please refer to the attached additional information Attached Letter:</p> <p>We are broadly supportive of the vision for Newport, it is a significant City that will need to play its part in the future success of Wales. Indeed, its role will be vital as the gateway City in ensuring a robust economic and social recovery as restructuring continues post Covid, Post Brexit and with the energy crisis faced. Indeed, as stated in the document Newport has some of the poorest and wealthiest communities in Wales and it is therefore appropriate that reducing inequalities is a core element of the vision.</p>	<p>Support noted. We believe the vision as currently drafted appropriately captures the points raised, recognising that sustainable development encompasses more than just housing. Housing specifically is addressed at the Objective stage where more targeted measures can be implemented to meet the various needs of Newport. Further consideration will be given to these points at the policy development stage.</p>

<p>We believe that meeting peoples housing needs and ensuring provision of affordable and sustainable new homes should be explicitly stated as part of the vision. Indeed, building new homes has always been a core element of economic recovery strategies and it can play a significant role in the future of the economy not just in terms of matching jobs to homes but also in the direct and indirect spin offs for the construction sector. Indeed, the delivery of new homes in appropriate locations through the LDP, has been a core tenet of the success of the Plan and the Council should be applauded for helping to facilitate this. These levels of growth have demonstrated that the right sites in the right locations can ensure Local Development Plans are successful. Importantly, it is recognised that completions have fallen slightly behind the level required in the LDP which emphasises the value of finding and allocating appropriate sites in the right location indeed, we believe that the success of the LDP can be replicated if this is achieved. Planning Policy Wales (PPW) is clear that the planning system must "identify a supply of land to support the delivery of the housing requirement to meet the differing needs of communities across all tenures". Our clients are strongly of the view that this must form a key tenet of how the authority will look in 15 years. In addition, we believe that the Council should make a commitment to protecting residents from the potential wider impacts of macro economic problems upon society and the economy. Whilst the extent of changes is unknown it is likely that the plan will need to ensure a flexible approach to ensure the delivery of development proposals</p>	
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**00169/VIO/3/003 - Do you agree with the issues identified? If not, how and why do you think they should be changed?**

<b>Comment</b>	<b>Officer Response</b>
<p>Please refer to the attached additional information Attached Letter: We would note that Wales as a whole is facing its most significant challenges for some considerable time and it is without question the case</p>	<p>- The challenges described are noted and will inherently influence the development of the plan. The plan will be based on this context and that forecasted for the next 15 years to cover the lifespan of the plan.</p>

that the Replacement LDP is being prepared under some of the most challenging societal and economic conditions since World War Two.

The following issues overlap a number of the main objectives and we believe that the plan must address these in a joined up and coherent strategy. Indeed, positive planning interventions are required in order to help address these issues.

Post Covid 19 recovery, energy crisis and Brexit

Under a number of the objectives reference is made to post Covid and Brexit Recovery, in addition the impacts that the energy crisis will have upon this and our communities ought to be recognised. Indeed, over recent years we have experienced exceptional circumstances that have the potential to severely and drastically impact upon the economy and society as a whole. We are strongly of the view that the planning process must play its part in helping to facilitate the economic recovery that is needed. Plainly economic recovery must form an over-riding requirement of the plan and without question must underlie the approach to be taken.

Constraints in adjoining Authorities

We are surprised that there has been no mention of the significant housing supply constraints in adjoining Authorities. Newport has not just been dealing with its own needs in recent years and accordingly needs to consider the offsets from new homes not being provided in its neighbouring authorities. Whilst housing land supply requirements were formally abandoned by the Welsh Government it does not change the record of poor delivery elsewhere and it follows logically that where needs aren't met within an Authority they will need to be accommodated somewhere. Whilst this is an unsatisfactory and unsustainable position there is unlikely to be any change in this in the short term. Indeed:

- Torfaen & Caerphilly - as of April 2021 there was a cumulative shortfall across the two Authorities of over 4,000 dwellings from the levels envisaged within their respective Local Development Plans. This represents that number of households that could not be provided in those

- Many of the other points raised will be explored in further detail as part of the Growth and Spatial Options stage to come.

- Candidate Site assessments are occurring separately from this process. The outcome of those assessments will be published at a later stage in the process.

respective Authorities. This is a shortfall of national significance that has a profound effect on house prices across the region.

- Monmouthshire - representations made by the Welsh Government on the Monmouthshire LDP would have meant that further new housing allocations would not be needed in Monmouthshire. Given the additional constraints in Monmouthshire, including Phosphates, it is likely that demand will be displaced from Monmouthshire to adjoining Authorities. Plainly, policy and supply constraints in adjoining Authorities will have a significant impact upon Newport Council in respect of the housing market and affordability issues. This is a challenge that the LDP will need to consider how it responds to.

#### Meeting needs

It will be of utmost importance to ensure Newport establishes a level of growth that meets needs and does not exacerbate the existing supply constraints in South Wales, taking into consideration the shortfalls in adjoining Authorities alongside Newport's own needs. Rather we are of the view that a high level of growth will need to be set in order to meet the Vision and fulfil the strategic aspirations for Newport as a Gateway City to Wales. In this regard it is noted:

- o Given the potential impacts of Covid 19 on the economy and society, there will be a need to adopt for a highly ambitious strategy which provides far greater flexibility to respond to the crisis through added stimulation of the construction sector;
- o Account should be taken in the baseline figures of the levels of sustainability and self containment that can be achieved through embracing working from home trends for those sectors where it is feasible. These are often the high added value jobs that are no longer tied to cities such as Bristol or Cardiff but can retain expenditure in the local area and encourage vibrant local areas;
- o Any requirement should ensure an appropriate level of flexibility for delivery indeed, it may be that a 20% flexibility allowance or greater provides an appropriate starting point; and



o It is likely that in addition to the flexibility allowance, a "non implementation" allowance of the land bank will also need to be applied. We will comment on this further when detailed information becomes available.

#### Addressing affordability

The Council's result in nearly achieving its affordable housing target for 2015-2020 is to be welcomed. However, the Council recognise that this is only a small proportion of the actual level of need. The latest Local Housing Market Assessment (LHMA) indicates that "as of the 31st March 2017 there were 6,838 households with active applications on the housing waiting list. In order to clear this backlog during the 5 year life of this LHMA we would need to allocate 1,368 units of accommodation each year". The final stated annual shortfall is 559 per annum which equates to 2,795 over the 5 year period. This is plainly a significant issue within the Authority which has no doubt been exacerbated by price increases that have been caused due to shortages of housing supply outside of the County.

Our clients are of the view that the replacement LDP provides an opportunity to seek to address affordability in a meaningful and substantive way.

#### Sustainable growth locations

It is inevitably the case that the supply of brownfield sites in Newport for redevelopment for residential purposes is limited. As such, the Council will need to consider sustainable and appropriate greenfield locations based around existing communities. In reality this is likely to focus on the western and north western parts of the County extents associated with existing built form and communities. Indeed, we are of the view that the LDP must not neglect the requirements of these existing communities in favour of more remote areas on the Eastern side of the City that would be more aligned to commuting patterns along the M4.

It is anticipated that such focal points for proportionate growth include a number of existing communities where there are a number of local facilities that can provide an opportunity to maximise levels of self-containment and sustainability. Indeed, proportionate growth can help to

reinforce existing levels of sustainability but also seek to provide additional facilities and uses that can move to a greater level of neighbourhood and community well-being. In this regard, our clients consider that High Cross is a suitable location for proportionate sustainable growth.

#### High Cross

It is considered that High Cross is a sustainable location for proportionate growth but there are very limited opportunities for such development with the exception of our client's site.

Indeed, their site is immediately adjacent to the recently constructed Serennu Children's Centre and housing estate of Cwrt Camlas which laid access points into their land when it was constructed in anticipation that it forms a logical follow on.

The site occupies a sustainable location which is considered appropriate for residential development. The following services are available within the settlement, within walking distance of the site:

- o Mini Market providing groceries, newsagent, a post-box and an off-licence - 160m;
- o High Cross Primary School - 400m;
- o Co-Operative Food Store - 500m;
- o Texaco Garage - 500m;
- o Athletics club - 500m;
- o The Rising Sun Hotel and Restaurant- 550m;
- o Hair salon - 600m; and
- o Veterinary clinic - 600m.

A greater number of services are available at nearby Local Centres. Greenfield Road is 1.1km from the site and offers a convenience store, takeaway food outlets and beauty services. Thornbury Park is 1.5km from the site and offers a post office and takeaway food outlets.

In terms of education, High Cross Primary School is located within 400m walking distance of the site and Bassaleg Comprehensive School is situated 2.4km south of the subject site. In terms of Welsh-medium education, Ysgol Gymraeg Ifor Hael and Ysgol Gyfun Gwent Is Coed offer primary education 5.1km away and secondary education 5.7km away, respectively.

The Serennau Children's Centre is located less than 100m from the site and provides activities and leisure uses for its users. Associated infrastructure includes a Multi-Use Games Area and two play parks. The site is provided by the National Health Service, a public body, thus it is assumed that this area is available for public use.

Saint Anne's Church Hall is 850m from the site and provides a communal space frequently used for leisure, health and fitness purposes (pre Covid-19). The Hall acts somewhat like a hub for community purposes, hosting a variety of fitness classes, group meetings and events.

An Athletic Club is 550m from the site and provides a sports and social club with cricket and rugby pitches. West of this, lies a large parcel of managed grassland with formal access points located at High Cross Road (270m from the site), Tudor Crescent, Ty-Du View and High Cross Drive. With informal paths passing through the site in many directions, this open space appears to be used both socially and leisurely for active uses by local residents. West of this lies a number of allotments (600m from the site) which are available to let from between £2.55 and £10.20 per annum.

The Fourteen Locks Canal Centre is located just 220m north-west of the site, and a Public Right of Way runs parallel to the Canal. This includes a shared cycle/foot path and bridleway, demonstrating that this space may be used both leisurely and socially by local residents.

Four bus stops are located within 550m of the site along High Cross Road, offering access to routes 56 and R1. Bus route 56 operates between Newport and Tredegar, providing 14 weekday services in each direction. Bus route R1 operates between Newport and Risca, providing 11 weekday services in each direction. It takes approximately 15 minutes to reach Newport Bus Station via either of these routes, whereby a greater number of bus services offer access to a wider vicinity, including Cardiff, Chepstow and Monmouth.

The nearest rail station is located at Pye Corner, 1.3km walking distance south of the subject site. The station is located along the South

Wales Valleys Line, which serves a number of routes surrounding Cardiff and the Valleys. More specifically, Pye Corner is situated on the Ebbw Vale Town - Treherbert line which travels via Cardiff Central. Westbound, this service operates between 07:13 and 23:17 providing 17 weekday services and eastbound this service operates between 06:16 and 21:33 providing 16 weekday services. The South Wales Valleys Line serves a greater number of local destinations, albeit these routes may require some changes.

In close proximity to the site, an established shared foot/cycle path runs parallel to the canal north of the site, serving National Cycle Route 47. This is a national route which extends from Fishguard to Newport. Considering the more local context, the Route passes between Risca and Brynglas, and offers opportunities to connect with a number of other Existing Route which serve the wider active travel network.

The wide array of local facilities afford an opportunity for future residents to maximise the proportion of their everyday lives within their local neighbourhood without relying upon the need for private car trips. It is considered an appropriate location for the provision of proportionate growth that would complement existing facilities will provide more opportunities for local people to remain in the area. Importantly it would contribute to addressing a number of the issues set out within each of the draft Objectives in particular by virtue of the fact that it would be providing homes in a sustainable location that it is well linked to existing facilities and both active and public transport networks. It will:

1. Provide a modest scale of development for local people along with much needed affordable housing;
2. Support and enhance existing facilities and services through providing homes in an appropriate location;
3. Provide an opportunity to focus development in a sustainable location that is well served by public transport and within easy reach of a wide range of facilities, helping to create a move away from reliance upon the private car;

<p>4. Capitalise on its location in close proximity to the canal to the north and the recreational benefits associated. The site's location, in proximity to a number of walkable local services, alongside proximity to Fourteen Locks, presents an opportunity to develop a residential scheme with an array of leisure and recreational offerings available within walking distance.</p> <p>6. Provide enhanced facilities for the Children's centre in particular providing additional storage area and overspill car parking. It is noted that many of the users (parents and children along with specialist Doctors and Care Givers) cannot use public transport for various reasons and are reliant upon travelling to the Centre by car;</p> <p>7. Adopt an approach to design that reflects the traditional local character, density and appearance; and</p> <p>8. Make an appropriate use of a site that can be accommodated without harm to landscape or biodiversity but rather can formulate a strategy to help improve both. The illustrative masterplan includes landscape enhancements through a countryside green edge to the east and a vegetated buffer to the north. This will prevent impact on the existing uses and landscape features identified to the north of the site. Further, the parcel of land to the east of the site is demonstrated as benefitting from strategic woodland planting of native woodland and flowering fruit trees. Collectively, these enhancements seek to enhance the existing features of the natural landscape.</p>	
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**00169/VIO/3/004 - Do you agree with the Objectives for the RLDP? If not, how and why do you think they should be changed?**

<b>Comment</b>	<b>Officer Response</b>
<p>Please refer to the attached additional information Attached Letter: In general terms we are supportive of the overall approach towards the objectives, however, we believe that particular attention is needed with regards to economic and population / community objectives. As we have stated earlier, there are significant challenges ahead and it</p>	<p>Support noted. Economy and Employment: - We believe that the Objective as currently drafted appropriately accommodates the points raised. Further consideration will be given to more specific matters as policy development progresses. Population and Communities:</p>

must be the role of the planning process to help address these issues rather than constrain recovery and realignment.

With regards to specific objectives:

Economy & Employment -

We are supportive of the approach towards employment land in general and the principles of the objective. However, as stated previously it is clear that economic restructuring and re-alignment will be a significant aspect of the replacement plan period. Flexible and innovative ways of approaching this will be required. Indeed, there has already been a shift in recent years in employment patterns and requirements, as such we would expect numerous trends to be reflected in the strategy. For example:

- o working from home is a key change with the Welsh Government seeking to achieve 30% of the workforce working from home, this has opportunities for local sustainability but also for larger centres such as Newport City Centre that will need to be considered;
- o there should be some recognition of non office based home working needs such as in respect of tradespersons (eg plumbers, carpenters etc) storage arrangements;
- o Non B-uses ought to be considered as an important means of achieving employment requirements; and
- o a significant amount of economic restructuring has already taken place over the past two years, particularly in respect of the need for more warehousing and distribution facilities associated with home deliveries, online retail and Brexit arrangements. South Wales has traditionally lost out on investment opportunities associated with such uses (given the facilities available at Severnside) however, it is considered likely that Newport will need to accommodate such uses to capitalise upon opportunities and to complement its approach to sustainability.

Population & Communities

As stated previously our clients are strongly of the view that it will be important to ensure a suitable supply of housing land is identified in order to meet needs. Indeed, It will be of utmost importance to ensure Newport establishes a level of growth that meets needs and does not

- The Vision and Objective as currently drafted already reflect Newport's role as a National Growth Area. The Growth and Spatial Options stage will explore in further detail the matters raised.

<p>exacerbate the existing supply constraints in South Wales. Rather we are of the view that a high level of growth will need to be set in order to meet the Vision and fulfil the strategic aspirations for Newport as a Gateway City to Wales. In this regard it is noted:</p> <ul style="list-style-type: none"> <li>o given the potential impacts of Covid 19 on the economy and society, there will be a need for a highly ambitious strategy to be adopted which provides far greater flexibility to respond to the crisis through added stimulation of the construction sector; and</li> <li>o account should be taken in the baseline figures of the levels of sustainability and self-containment that can be achieved through embracing working from home trends for those sectors where it is feasible. These are often the high added value jobs that are no longer tied to cities such as Bristol or Cardiff but can retain expenditure in the local area and encourage vibrant local areas.</li> </ul>	
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**00169/VIO/3/005 - Any other comments**

<b>Comment</b>	<b>Officer Response</b>
<p>Please refer to the attached additional information Attached Letter: It is noted that our client is currently in the process of liaising with house builders and housing associations in respect of refining development proposals. However, they would welcome early engagement with the Council on the role that the site could play in the delivery of sustainable communities through the replacement LDP.</p>	<p>Candidate Site assessments are occurring separately and any discussions necessary will be undertaken as part of that process.</p>

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**Barratt David Wilson Homes - 00655**

**Date Acknowledged:** 25.03.2022

**Date Received:** 25.03.2022

**00655/VIO/2/001 - Do you agree with the Vision for the RLDP? If not, how and why do you think it should be changed?**

<b>Comment</b>	<b>Officer Response</b>
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<p>The LDP Vision should clearly set out what it is trying to achieve over the Plan period and should set a positive aspirational tone, whilst also addressing the specific local needs and challenges for the area.</p> <p>BDW generally agree with the Draft Vision for Newport. It is encouraging that it sets objectives for becoming a strategically significant and economically thriving city which will contribute towards the national growth of Wales. However, BDW considers that the Vision could go further in terms of being more ambitious given Newport's important status within Future Wales' South East Growth Area. Policy 33 of Future Wales sets out that Newport (together with Cardiff and the Valleys) will be the main focus for growth and investment in the South East region, and Strategic and Local Development Plans should recognise the National Growth Area as the focus for strategic economic and housing growth; essential services and facilities; advanced manufacturing; transport and digital infrastructure.</p> <p>BDW consider that the Vision should properly recognise the important role new housing has to play in supporting employment growth and in particular the South East Wales Growth Area identified in Future Wales. Greater emphasis should be placed on the role that new housing development will have in terms of achieving this growth.</p>	<p>Support noted. We believe the vision as currently drafted appropriately captures the points raised, recognising that sustainable development encompasses more than just housing. Housing specifically is addressed at the Objective level where more targeted measures can be implemented to meet the needs of Newport. Further consideration will be given to these points at the policy development stage.</p>
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**00655/VIO/2/002 - Do you agree with the issues identified? If not, how and why do you think they should be changed?**

<b>Comment</b>	<b>Officer Response</b>
<p>BDW generally agree with the range and nature of issues that have been identified as important for the RLDP to address, to ensure that Newport realises its potential for sustainable growth, in line with the aspirations of Future Wales.</p> <p>It is considered that a number of related issues could be addressed through the sustainable release of suitable, accessible greenfield land for development, where it is free from technical constraints and where it adjoins existing settlement boundaries, which would represent the most suitable location for urban expansion. Such sites could make a meaningful contribution to meeting the identified housing need and provide</p>	<p>Support noted. These matters will be explored further as part of the Growth and Spatial Options stage, and subsequently considered as part of the policy development stage.</p>



<p>open space and other benefits for the development and the wider community. The RLDP process will also provide an appropriate opportunity to review development viability, particularly in respect of new policies introduced by Welsh Government, such as Sustainable Urban Drainage (SUDs), Green Infrastructure, Climate Change and Placemaking requirements. Appropriate mechanisms should be put in place so that such policy requirements will not render development unviable and undeliverable, given the need for growth.</p>	
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**00655/VIO/2/003 - Do you agree with the Objectives for the RLDP? If not, how and why do you think they should be changed?**

<b>Comment</b>	<b>Officer Response</b>
<p>BDW consider that the draft objectives are generally compatible with the cross-cutting themes of the National Well Being Goals and the Key Planning Principles and National Sustainable Placemaking Outcomes from Planning Policy Wales. However, it is considered that there is scope to develop and enhance some of the objectives further in the RLDP, as outlined below.</p> <p>Economy and Employment Objective: Provide for Newport's economic growth by offering a diverse range and choice of new and improved employment opportunities, which are adaptive to change and meet the needs of Newport and beyond, supporting a strong skilled and resilient workforce.</p> <p>BDW support this objective together with the acknowledgement in the supporting text that Future Wales identifies Newport as a National Growth Area, and notes that Welsh Government supports Newport as the focus for regional growth and investment and wants to see the City play an increased strategic role in the South East Wales Region.</p> <p>BDW agree that Newport's economy is of national importance, playing a significant role within South East Wales, as an accessible and affordable location supported by national infrastructure. It also plays a key role as part the Cardiff Capital Region and the Western Gateway.</p> <p>It is very positive that the latest AMR shows job growth has increased throughout the monitoring period and is above the LDP target set for</p>	<p>- Support noted.</p> <p>- It is recognised that there is an inherent link between housing and employment growth. Growth levels for the RLDP will be considered in detail as part of the Growth and Spatial Options stage.</p> <p>- The Economy and Employment Objective in its current form is considered to appropriately recognise the flexibility required to adapt to change and meet the needs of Newport, including work patterns.</p>

this period (2015-2021) and following recent economic investments, Newport will continue to enhance its identified roles and contributions to both local and larger economies.

Alongside planning for increased economic growth, it will be of vital importance to plan for major new housing development to support employment development, and to retain and attract a skilled workforce. BDW consider that Newport should accommodate very ambitious growth levels, given its allocation within a National Growth Area, in order to effectively contribute to the economy and support Wales's recovery from the Covid-19 pandemic.

BDW also consider that the RLDP should promote the continuation of working remotely or from home, in line with the Welsh Government's objective. This has an important role to play in terms of supporting a strong, skilled and resilient workforce alongside numerous sustainability benefits.

#### Population and Communities

Objective: To provide high-quality homes that meet the needs of Newport, as a national growth area, and to ensure that these homes are supported by the necessary social, environmental, cultural and physical infrastructure to provide safe and healthy places for people that maintain and enhance community and settlement identities.

BDW fully support this objective and the acknowledgement that Future Wales identifies Newport as a National Growth Area. BDW consider it is essential that high-quality homes are provided in sustainable locations to meet the growing needs of Newport.

It is significant that since 2014, Newport's population growth rate has been the highest in Wales, more than double the national rate, and that population growth in Newport is predicted to continue to increase; and with it requirements for homes, jobs, facilities and infrastructure.

BDW is also aware that Newport was recently identified as having the biggest rise in the value of homes of any local authority area in the UK.

Over the past five years, house prices in the city have increased by an average of 49.9 per cent, which is 26.4 per cent above the UK's

average increase.

Noting the above points, together with Newport's location with an identified National Growth Area, BDW consider that Newport should be seeking to achieve a higher rate of housing delivery, as it has reached in recent years, in order to achieve the necessary growth and ease the pressures within the local housing market.

BDW note the acknowledgment in the supporting text to this objective that the current LDP, which sets out a brownfield-led growth strategy, has been successful and has delivered 94% of its total housing development on brownfield land. It is significant to note that there is now a limited supply of brownfield sites that are available, suitable and viable for residential development. The Council can no longer rely on brownfield sites alone to meet the housing needs and growth aspirations of Newport over the RLDP period. It is vital, therefore, that the RLDP allocates a sufficient supply of greenfield sites to meet housing needs and that these sites are planned properly through the RLDP process to ensure they deliver a mix of housing types, tenures and sizes, supported by necessary social, physical and environmental infrastructure, to fully realise this objective.

#### Health and Well-being

Objective: To improve health and well-being through the creation of well-connected, accessible, healthy and active places, tackling health and socio-economic inequality through sustainable growth.

BDW support this objective and agree with the statement in the supporting text that the Covid-19 pandemic has illustrated the huge importance of the quality and accessibility of open and green spaces for people's physical and mental health and well-being. It is noted that some areas of Newport are in excess of the required formal and informal spaces in those areas, but some areas are deficient and the authority has an overall shortfall of 21 ha.

BDW consider that new housing development has a key role to play in providing accessible open space and integrated green infrastructure

for the benefit of the wider community, which will provide necessary opportunities for residents to interact and appreciate nature to improve well-being.

It should also be recognised that new development can improve the sustainability of an existing settlement through financial contributions and incentives associated with the development, along with effective Travel Planning that promote more sustainable modes of travelling, reducing overall carbon emissions.

BDW also consider it important that the RLDP should promote remote working/ working from home in line with the Welsh Government's objective. It should be recognised in the RLDP that the pandemic changed the way we live, work, travel and socialise. Many people have worked away from the office during lockdown and organisations should now be supported to facilitate a long-term shift to more people working remotely. The numerous health and well-being benefits of remote working are notable, and for local economies, businesses, individuals and the environment, these include:

- o a reduction in travel time and expense
- o more flexibility and better work life balance
- o increased productivity
- o less traffic, especially at peak times
- o less air and noise pollution
- o the opportunity to redesign our towns and city centres

Equality, Diversity, and Inclusion

Objective: To create quality positive places where development realises the multiple benefits from the creation of inclusive, connected, adaptable and accessible communities that are cohesive and where Newport's culture, including the Welsh language, is valued and promoted.

BDW support this objective and the promotion of placemaking in planning and design as noted in the supporting text. It is important to create places where people want to live and spend time and BDW agree that the availability and accessibility of day-to-day facilities and

employment opportunities contributes to the quality of a place. This is important in terms of addressing inequality, health and well-being. The allocation of appropriate sites for development, which enable these objectives to be met, should be considered accordingly through the RLDP process.

It is noted in the supporting text that there is an outstanding need for affordable housing to be met in Newport. BDW consider that the release of appropriate greenfield sites for residential development will have a key role to play in the delivery of much-needed affordable housing subject to viability considerations.

#### Transport and Movement

Objective: Reduce the need to travel and increase the use and provision of sustainable travel options

BDW support this objective along with the acknowledgment in the supporting text that limits to the brownfield supply of land will mean that development of greenfield sites will need to be considered as part of the RLDP, and the most sustainable travel options will need to be delivered.

BDW consider that sites should be allocated for development where they are accessible in terms of walking, cycling and public transport, and that developments should create a permeable network of streets to facilitate this.

As noted previously, a key part of reducing the need to travel is the promotion and facilitation of remote working, in line with the Welsh

Government's objective for increasing the percentage of people working from home.

Specific reference should be made to this, given the numerous benefits of working from home that were realised during the pandemic in terms of traffic reduction, air quality, health and wellbeing.

#### Natural Resources

Objective: Sustainably manage the natural resources in Newport to meet the needs of present and future communities, by ensuring resource efficiency, improved health outcomes, and the creation of a successful circular economy and green growth.

BDW note the importance of sustainably managing natural resources and setting planning objectives to achieve this. In relation to agricultural land, it is noted in the supporting text to this objective that there are important choices to be made in the RLDP process as to how to use this land sustainably.

The choice to use previously developed sites for new development is the basis of the current LDP strategy for Newport and this has been very successfully implemented. As such, the supply of brownfield sites is now very limited and there is a need for greenfield land to be released to meet the pressing need for new homes, which should outweigh concerns relating to the loss of some agricultural land.

#### Biodiversity and Geodiversity

Objective: To maintain, enhance and improve the biodiversity and geodiversity of Newport and its surrounds, including improved resilience, diversity, connectivity and adaptability, whilst ensuring net benefits are facilitated from development

BDW supports this objective and considers that new housing development sites will have a key role to play in terms of creating opportunities to enhance existing and establish new green infrastructure corridors to improve connectivity, particularly within urban areas.

#### Landscape

Objective: To protect and enhance the quality and character of Newport's landscape, townscape and seascape, and maximise the opportunities these features offer.

BDW supports this objective and agrees with the supporting text where it states that the location, scale and design of any proposed development should be required to take account of its landscape setting as appropriate. It should also be reiterated in this section that the supply of brownfield sites in Newport is now very limited and there is general acceptance of the need for greenfield land to be released to meet the pressing need for new homes. BDW consider that current urban and village boundaries should therefore be extended, where

appropriate, particularly where this would avoid the need to develop other land within designated areas (e.g. green wedges, green belt, SLAs) and would avoid coalescence with other urban areas. Through the use of good design principles, layout and appropriate and effective landscaping, sensitive development could be planned for such locations.

Climate Change

Objective: To ensure that development and land uses in Newport are resilient to the effects of climate change, and actively tackle the causes and impacts of climate change through minimisation, adaptation and mitigation

BDW is supportive of this objective and is committed to tackling the causes and impacts of climate change, being the first national housebuilder to announce major new targets to reduce carbon emissions.

BDW note that the Council has declared a Climate and Ecology Emergency, following the Welsh Government's declaration of a climate emergency, and the setting of net zero emissions targets for 2050. The priority in dealing with climate change is to reduce the consumption of energy and resources.

In this regard, it is important to note that new housing development promoted through the RLDP will be built to Part L 2025 which means the new homes will produce at least 75% less CO<sub>2</sub> emissions compared to 2014 standards. New homes have a crucial role in decarbonising housing and paving the way for the adoption of new technologies that can then be introduced into existing buildings.

BDW consider it will be important for new housing sites to be located outside Air Quality Management zones.

SuDS also supports development resilience to climate change, reducing the risk of localised surface water flooding, and will be required for major development proposals going forwards.

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**TATA Steel Ltd - 00170**

**Date Acknowledged:** 25.03.2022

**Date Received:** 25.03.2022

**00170/VIO/4/001 - Do you agree with the Vision for the RLDP? If not, how and why do you think it should be changed?**

<b>Comment</b>	<b>Officer Response</b>
<p>Tata agrees that Newport is a strategically significant City and welcomes recognition within the draft vision that it can contribute towards the national growth of Wales. This represents an important and positive benchmark from which to set an overarching vision for what the LDP will seek to achieve over the plan period.</p> <p>To fulfil this aspiration, and the contribution Newport can make to the national growth of Wales, Tata agrees that Newport should be an economically thriving City, which supports/attracts business and industry at all scales. An aspiration to attract businesses/industries that focuses on sustainable, innovative and technologically leading practices is positive. The LDP must, however, support a broad range and choice of employment opportunities across the plan period.</p> <p>Tata supports the aspiration to sustainably manage Newport's natural resources. An important part of this will be maximising opportunities to re-use brownfield land, alongside appropriate greenfield development.</p>	<p>Support noted. We are satisfied that the vision in its current drafting appropriately caters for the broad range and choice of employment opportunities required across the plan period.</p>

**00170/VIO/4/002 - Do you agree with the issues identified? If not, how and why do you think they should be changed?**

<b>Comment</b>	<b>Officer Response</b>
<p>Please see response relating to the draft objectives below.</p>	<p>See Objectives response.</p>

**00170/VIO/4/003 - Do you agree with the Objectives for the RLDP? If not, how and why do you think they should be changed?**

<b>Comment</b>	<b>Officer Response</b>
<p>It is noted that the draft objectives are based around ten key themes, which will be the focus for the evidence base and policy development.</p> <p>The objectives will clearly be refined as the plan progresses and further comments will be submitted on behalf of Tata (as required) at later stages of the plan.</p> <p>Economy and Employment</p> <p>Tata strongly supports the identification of a specific objective relating to the 'economy and employment'. It welcomes recognition that in</p>	<ul style="list-style-type: none"><li>- Support noted.</li><li>- National Planning Policy is clear on the need to prioritise brownfield sites first.</li><li>- Further consideration will be given as to whether site specific policies may be appropriate for inclusion in the RLDP.</li><li>- The Council are supportive of working closely with relevant stakeholders to discuss specific topics/issues that the RLDP needs to address.</li></ul>



order to provide for Newport's economic growth, the plan must enable a 'diverse range and choice of new and improved employment opportunities'. Tata also supports the acknowledgment that employment opportunities should be 'adaptive to change' and flexible to meet the needs of Newport and wider areas.

The consultation document rightly recognises that the Newport economy is of national importance, but also plays a key role in the regional economy (as part of the Cardiff Capital Region and the Western Gateway). Providing for the right amount and type of employment opportunities, and in appropriate locations, will be fundamental to fulfilling this important local, regional and national role. The preparation of a robust evidence base will be an important part of informing decisions around this objective.

Whilst there is likely to be a need for greenfield sites to come forward for employment development, the important role that existing brownfield sites can play must also be recognised in the plan. Such sites have potential to deliver significant new economic development over the plan period. Where appropriate specific sites (i.e. opportunities of significant scale/potential), should be recognised and supported via specific policies within the LDP. This will provide greater certainty and help realise the strategic economic growth and investment potential of such sites.

Supporting infrastructure is important to delivering new and improved employment opportunities. Accessibility (in all forms) will be critical, particularly for Newport to fulfil its potential as an integral part of the economic growth of the City Region and wider Western Gateway. This point is returned to below.

It is important that all stakeholders work together to ensure that existing infrastructure is maximised and where necessary, new/improved infrastructure is in place to deliver the aspirations for economic growth. This includes the delivery of new rail infrastructure (including a new station to serve the east of the City at Llanwern) and ensuring sufficient links are in place for the road network to continue to operate safely

- Policy 16 of Future Wales notes that the implementation of district heat networks is necessary unless demonstrated to be unfeasible.

and efficiently.

#### Transport and Movement

Tata welcomes the inclusion of a specific objective relating to 'transport and movement'.

This will be integral to delivering other objectives

within the plan, including those relating to the economy/employment. Whilst we

welcome the aspiration to reduce the overall need to travel

and increase the use/provision of sustainable travel options, there also needs to be

sufficient investment in new/improved infrastructure to

ensure that the whole network can support economic growth aspirations.

The consultation document recognises that there are known capacity issues

within/surrounding Newport. Given the decision to not progress

the M4 relief road, it is important that all stakeholders work together to ensure the

accessibility issues are addressed. To do so will require a

collaborative approach, with Welsh Government and key stakeholders working together

to deliver improvements to existing infrastructure,

pedestrian, cycle and public transport, but also ensuring that the road network (including

connections to the M4 and across the City) is

sufficient to support Newport's existing and future businesses (and the role they play in

the local, regional and national economy).

Continued improvements to the rail infrastructure are supported, including proposals for

a new station to serve the east of Newport at

Llanwern. Opportunities to maximise the role of moving freight via rail should also be

recognised and considered as part of future land use

choices having regard to opportunities around the Tata land holdings.

#### Natural Resources

As part of an objective to 'sustainably manage the natural resources in Newport', it is

important to recognise the need to maximise

opportunities for brownfield development/redevelopment. This should include realising

opportunities for economic development

within/around existing employment sites.

#### Climate Change

The supporting text notes that Future Wales identifies the potential to establish a district

heat network within Newport. The consultation

document states that large developments will continue to be required to investigate opportunities to deliver district heat networks. It is important that the emerging LDP reflects that Future Wales acknowledges that feasibility should be considered when determining whether a heat network is an appropriate solution. This is important to ensure sufficient flexibility is allowed and future opportunities for viable economic development are not unnecessarily impeded.

**Bronafon Housing Association - 00706**

**Date Acknowledged:** 25.03.2022

**Date Received:** 25.03.2022

**00706/VIO/1/005 - Intro**

Comment	Officer Response
<p>We set out herein our client's response to the Newport Local Development Plan Draft Visions, Issues and Objectives consultation paper. Our client, Bron Afon, have an interest (or are in the process of establishing an interest) in a number of sites of various scales across Newport that they believe have the ability to provide sustainable and viable opportunities for meeting needs within the Authority.</p> <p>It is noted that Bron Afon are a Registered Social Landlord (RSL) that have historically operated within Torfaen but in line with recent changes to the scope of RSLs in Wales, are looking to help meet local housing needs in adjoining Authorities. They control over 8,000 properties within Torfaen County Borough and have aspirations to deliver approximately 100 to 150 new dwellings per annum over the next five years, across a range of Authorities, inclusive of both social and private sales. In this regard, they are well placed to help Newport deliver a sustainable and affordable supply of homes over the course of the period of the Replacement Plan.</p> <p>Our clients are pleased to have the opportunity to feed into the early stages of the plan preparation process and hope that their input is</p>	<p>Noted. However, Candidate Site assessments are being carried out separately to this process, and the results of this assessment will be published at a later stage.</p>

<p>helpful in forming the key components of the Plan. Currently, our clients have an interest in a site at Castleton (Bakery Lane) that was submitted as a candidate site, but are also at the early stages of liaising with other landowners that have submitted sites previously at Bettws, Rogerstone and Bassaleg. They are also in discussions regarding another site at Castleton with a view that they would contribute towards the delivery of the social housing element along with potential provision of private sales housing through their private sales arm which is in the process of being finalised.</p> <p>The sites above are at varying stages in preparation of evidence but our clients would welcome discussions with the Council on each of the sites and the work that has been undertaken and would be required. Indeed, our clients would be keen to demonstrate the sites that they are working on would be deliverable, viable and sustainable such that they can provide a timetable for delivery to feed into the Council's trajectory both on terms of private and affordable homes.</p> <p>Accordingly, our client's response to the Preferred Strategy is set out below and is to be considered against their overarching role which is to assist the Authority in meeting its housing needs.</p>	
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**00706/VIO/1/001 - Do you agree with the Vision for the RLDP? If not, how and why do you think it should be changed?**

<b>Comment</b>	<b>Officer Response</b>
<p>Please refer to the attached additional information</p> <p>Attached Information:</p> <p>We are broadly supportive of the vision for Newport, it is a significant City that will need to play its part in the future success of Wales.</p> <p>Indeed, its role will be vital as the gateway City in ensuring a robust economic and social recovery as restructuring continues post Covid, Brexit and as with the energy crisis faced. Indeed, as stated in the document, Newport has some of the poorest and wealthiest communities in Wales and it is therefore appropriate that reducing inequalities is a core element of the vision.</p>	<p>Support noted. We believe the vision as currently drafted appropriately captures the points raised, recognising that sustainable development encompasses more than just housing. Housing specifically is addressed at the Objective stage where more targeted measures can be implemented to meet the various needs of Newport. Further consideration will be given to these points at the policy development stage.</p>

We believe that meeting peoples housing needs and ensuring provision of affordable and sustainable new homes should be explicitly stated as part of the vision. Indeed, building new homes has always been a core element of economic recovery strategies and it can play a significant role in the future of the economy not just in terms of matching jobs to homes but also in the direct and indirect spin offs for the construction sector. Indeed, the delivery of new homes through the LDP, in appropriate locations, has been a core tenet of the success of the Plan and the Council should be applauded for helping to facilitate this. These levels of growth have demonstrated that the right sites in the right locations can ensure LDPs have success. Importantly, it is recognised that completions have fallen slightly behind the level required in the LDP which emphasises the importance of finding and allocating appropriate sites in the right location. Indeed, we believe that the success of the LDP can be replicated if this is achieved. Planning Policy Wales (PPW) is clear that the planning system must "identify a supply of land to support the delivery of the housing requirement to meet the differing needs of communities across all tenures". Our clients are strongly of the view that this must form a key tenet of how the authority will look in 15 years. In addition, we believe that the Council should make a commitment to protecting residents from the potential wider impacts of macro economic problems upon society and the economy. Whilst the extent of changes is unknown it is likely that the plan will need to ensure a flexible approach to ensure the delivery of development proposals.

**00706/VIO/1/002 - Do you agree with the issues identified? If not, how and why do you think they should be changed?**

Comment	Officer Response
<p>Please refer to the attached additional information Attached Information: We would note that Wales as a whole is facing its most significant challenges for some considerable time. It is without question the case that</p>	<p>- The challenges and opportunities described are noted and will inherently influence the development of the plan. The plan will be based on this context and that forecasted for the next 15 years to cover the lifespan of the plan.</p>

the Replacement LDP is being prepared under some of the most challenging societal and economic conditions since World War Two.

The following issues overlap a number of the main objectives that the plan must address in a joined up and coherent strategy. Indeed, positive planning interventions are required in order to help address these issues.

Post Covid 19 recovery, energy crisis and Brexit

It is noted that under a number of the objectives reference is made to post Covid and Brexit Recovery, in addition the impacts that the energy crisis will have upon this and our communities ought to be recognised. Indeed, over recent years we have experienced exceptional circumstances that have the potential to severely and drastically impact upon the economy and society as a whole. We are strongly of the view that the planning process must play its part in helping to facilitate the economic recovery that is needed. Plainly economic recovery must form an over-riding requirement of the plan and without question must underlie the approach to be taken.

Constraints in adjoining Authorities

We are surprised that there has been no mention of the significant housing supply constraints in adjoining Authorities. Newport has not just been dealing with its own needs in recent years and accordingly needs to consider the offsets from new homes not being provided in its neighbouring authorities. Whilst housing land supply requirements were formally abandoned by the Welsh Government it does not change the record of poor delivery elsewhere and it follows logically that where needs aren't met within an Authority they will need to be accommodated somewhere. Whilst this is an unsatisfactory and unsustainable position there is unlikely to be any change in this in the short term. Indeed:

- Torfaen & Caerphilly - as of April 2021 there was a cumulative shortfall across the two Authorities of over 4,000 dwellings from the levels envisaged within their respective Local Development Plans. This represents a significant number of households that could not be provided in

- Many of the other points raised will be explored in further detail as part of the Growth and Spatial Options stage to come.

- Candidate Site assessments are occurring separately from this process. The outcome of those assessments will be published at a later stage in the process.

those respective Authorities. This is a shortfall of national significance that has a profound effect on house prices and patterns of sustainability across the region.

- Monmouthshire - representations made by the Welsh Government on the Monmouthshire LDP would mean that further new housing allocations would not be needed in Monmouthshire. Given the additional constraints in Monmouthshire, including Phosphates, it is inevitable that homes will be required as a result of the overarching Welsh Government approach. New homes will be required to serve the residents of Monmouthshire including farm workers and key workers as they will be further priced out of their local areas. Plainly, policy and supply constraints in adjoining Authorities will have a significant impact upon Newport Council in respect of the housing market and affordability issues. This is a challenge that the LDP will need to consider how it responds to.

#### Meeting needs

It will be of utmost importance to ensure Newport establishes a level of growth that meets needs and does not exacerbate the existing supply constraints in South Wales, taking into consideration the shortfalls in adjoining Authorities alongside Newport's own needs. Rather we are of the view that a high level of growth will need to be set in order to meet the Vision and fulfil the strategic aspirations for Newport as a Gateway City to Wales. In this regard it is noted:

- o Given the potential impacts of Covid 19 on the economy and society, there will be a need to adopt a highly ambitious strategy which provides far greater flexibility to respond to the crisis through added stimulation of the construction sector which in turn will have numerous associated benefits;
- o Account should be taken in the baseline figures of the levels of sustainability and self-containment that can be achieved through embracing working from home trends for those sectors where it is feasible. These are often the high added value jobs that are no longer tied

to cities such as Bristol or Cardiff but can retain expenditure in the local area and encourage vibrant local areas;

- o Any requirement should ensure an appropriate level of flexibility for delivery indeed, it may be that a 20% flexibility allowance or greater

- o provides an appropriate starting point; and

- o It is likely that in addition to the flexibility allowance, a "non implementation" allowance of the land bank will also need to be applied. We will

comment on this further when detailed information becomes available.

#### Addressing affordability

The Council's result in nearly achieving its affordable housing target for 2015-2020 is to be welcomed. However, the Council recognise that

this is only a small proportion of the actual level of need. The latest Local Housing Market Assessment (LHMA) indicates that "as of the 31st

March 2017 there were 6,838 households with active applications on the housing waiting list. In order to clear this backlog during the 5 year

life of this LHMA we would need to allocate 1,368 units of accommodation each year".

The final stated annual shortfall is 559 per annum

which equates to 2,795 over the 5 year period. This is plainly a significant issue within the Authority which has no doubt been exacerbated by

price increases that have been caused due to shortages of housing supply outside of the County.

Our clients, an RSL that is only just starting to work in Newport, recognise the contribution that they can make and would welcome working

with the Authority in order to explore new and innovative ways of delivering affordable homes during the course of the plan period. Indeed,

the replacement LDP provides an opportunity to seek to address affordability in a meaningful and substantive way.

#### Sustainable urban extensions

Our clients are of the view that it will be important to consider all scales of potential development from minor rounding off of settlements and

infill to sustainable urban extensions. Indeed, the Welsh Government's guidance, "Building Better Places" actively seeks to achieve rounded

communities based on the underlying principles of place making.



The Town and Country Planning Association (TCPA) indicates that the full range of planning solutions should be available to communities in order to achieve "the most sustainable pattern of development locally". Guidance set out by the TCPA indicates that holistically planned urban extensions can enhance the natural environment and offer high-quality affordable housing and locally accessible work in beautiful, healthy and sociable communities. Such interventions could be exemplars in sustainability and energy efficiency.

The TCPA also note that "Major planned developments such as ....urban extensions provide an opportunity to design-in the greenest of technologies and infrastructure from scratch, in ways that are not possible in smaller infill schemes". Such schemes can set a benchmark in quality and approach that can lead the way for smaller schemes elsewhere in the Country.

Appropriately sized and scaled urban extensions provide the opportunity for new development to positively address existing issues by creating a planned environment to suit and cater for a critical mass of population, services and facilities. These can:

- o include a variety of housing types, tenures and densities along with neighbourhood centres with mixed uses and a range of facilities;
- o provide a landscape structure that builds on existing assets, including green infrastructure within the development, linking urban areas to the countryside beyond and creating a distinctive edge to the urban area;
- o provide opportunities for people to work locally and for small businesses to set up, grow and thrive;
- o present an opportunity to design energy efficient communities;
- o allow pedestrian, cycle and public transport networks to be fully integrated, often improving services available to the adjacent communities, increasing health and well-being by reducing the reliance on cars; and
- o support the surrounding communities by offering facilities not available locally. By providing affordable housing for people in the care and support sectors they can ensure that the elderly can continue to live independently amongst friends and family reducing the costs of

providing social and nursing care.

These concepts are best delivered through consideration of longer term time horizons and wider geographical areas so that the benefits of strategic solutions are explored. The alternative of short term, small scale, incremental and dispersed change will not yield the same overall benefits.

Importantly, by applying a coherent and distinctive urban design concept and master planned approach that combines innovative solutions and reflection of local characteristics, such extensions can provide the opportunity to create a new development that has a strong local identity. This will facilitate effective integration with the existing community for whom there should be major benefits particularly in relation to supporting the existing rural economy and creating jobs, but also in the provision of a range of housing sizes, styles and tenures to accommodate those currently priced out of the local housing market. This accords with a wide range of national planning policy requirements.

Sustainable growth locations

It is inevitably the case that the supply of brownfield sites in Newport for redevelopment for residential purposes is limited. As such, the Council will need to consider sustainable and appropriate greenfield locations based around existing communities. In reality this is likely to focus on the western and north western parts of the County extents associated with existing built form and communities. Indeed, we are of the view that the LDP must not neglect the requirements of these existing communities in favour of more remote areas on the Eastern side of the City that would be more aligned to commuting patterns along the M4.

It is anticipated that such focal points for proportionate growth include a number of existing communities where there are a number of local facilities that can provide an opportunity to maximise levels of self-containment and sustainability. Indeed, proportionate growth can help to reinforce existing levels of sustainability but also seek to provide additional facilities and uses that can move to a greater level of

neighbourhood and community well-being. Bron Afon are considering an involvement in sites across a number of existing communities to the North and West of the City, importantly this recognises the existing settlement pattern outside of the main City of Newport, such locations include:

#### Bettws

Bron Afon consider that the community will benefit from the significant investment and opportunities that an extension located at Bettws would bring. Indeed, Bettws is itself a sustainable community with a range of shops, schools and facilities and is very well served by public transport. However, it is in need of investment and opportunities in order to help reduce localised inequalities. There is a significant opportunity to increase the level of self-containment of Bettws through providing new homes and other land uses that could add to the level of local facilities.

Bettws is very well served by regular bus routes, with typically a 20 minute frequency, to and from Newport running along Monnow Way. In addition, the canal towpath offers an easy and pleasant foot/cycle path route into the City centre, which is approximately 4km in distance. In the centre of Bettws there are a number of local facilities, including shops a Spar shop, post office, newsagent and hairdresser as well as several denominations of church, a library, a health centre, chemist, and dental surgery. Monnow Primary School and Newport High School are in close proximity. Bettws also has a number of sports grounds, playing fields and a leisure centre (active living centre associated with the High School).

Bettws is visually very well contained both physically and visually. It is not widely visible and in the limited local views in which it features it is seen in the context of the built up area of Bettws. It is therefore considered that it should form an area of search for a suitable urban extension.

Castleton / Marshfield

The communities of Castleton and Marshfield are a very sustainable local settlements partway between the Cities of Newport and Cardiff. They share a range of existing facilities and are considered to be highly appropriate for proportionate small scale extensions and infill development which will help provide affordable homes. Indeed, there is considered to be a significant need for more affordable properties to help ensure more balanced communities.

It is notable there is a wide range of local services and facilities that would ensure it is a suitable location for additional provision of homes:

- o Castleton and District Village Hall
- o Marshfield Primary School
- o Castleton Baptist Church Fellowship
- o Petrol Station
- o Convenience Store
- o Motor Vehicle Garage
- o Premier Inn Hotel
- o Coach and Horses Restaurant and Pub

Furthermore, they are located along sustainable public transport routes with bus stops present along Marshfield Road and the A48. These stops serve bus route 30, which operates between Cardiff and Newport via Old St Mellons, Castleton and Tredegar Park. This provides 28 services per day between Monday and Friday, 26 services on Saturdays and ten services on Sundays.

Summarily, it is clear that at the local scale a general level of self containment and walking can be achieved and strategically the communities are well placed in respect of public transport routes. Small scale expansion with proportionate affordable homes that do not impact upon landscape constraints (in particular coalescence with Cardiff) should be explored and encouraged.

Bassaleg

Bassaleg is a very well established and popular area of Newport with a wide range of local facilities and services. It is considered an

appropriate focal point to consider proportionate growth to reinforce and strengthen levels of sustainability. Indeed in terms of existing facilities, alongside the education provision there is a convenience store, post office, allotments, public open space, children's play area and the village hall.

There are numerous bus services that operate along the A468 (Caerphilly Road) providing links to both local areas as well as an inter urban bus service providing access to Newport, Caerphilly, Ystrad Mynach, Cardiff and Bargoed. The train service from Pye Corner to Cardiff Ebbw Vale is 1.8km away. The station is located on the proposed integrated route network that runs along Park View and can connect to the existing active travel route. There is car parking at the station.

It is considered an appropriate location for the provision of proportionate growth that would complement existing facilities provide more opportunities for local people to remain in the area.

#### Rhiwderin

Rhiwderin is a sustainable local community offering a range of facilities including a community centre, a newsagent, post office, place of worship and a public house. In addition, it is within a reasonable walking and cycling distance to Pentrepoeth Primary School and Bassaleg Secondary School.

In addition there are regular bus services close providing links to Newport City Centre as well as other inter urban bus services to surrounding towns including Caerphilly, Ystrad Mynach, Bargoed and Cardiff.

#### Rogerstone

Bron Afon consider that sites within easy walking distance of Rogerstone Railway Station, one of the few South Wales Metro rail connections within Newport's administrative area, should act as a focal point around which new development should be encouraged. Indeed, this links to Cardiff, Ebbw Vale, and beyond (to Swansea, Bristol, London and the Midlands). Furthermore, regular bus services run along Risca Road providing links between Newport and Risca/Pontymister as well as between Newport and Blackwood.

<p>There exists a wide range of facilities locally including supermarkets at Afon Village and Pontymister/Risca, a post office, various shops, restaurants, places of worship and employment areas such as the Wern, Tregwilym and Pontymister industrial / trading estates as well as Cleppa Business Park. Rogerstone Primary School, Jubilee Park and Mount Pleasant Primary Schools and Bassaleg Secondary School are also all within close proximity. Rogerstone is considered an appropriate location for the provision of proportionate growth that would compliment existing facilities provide more opportunities for local people to remain in the area.</p>	
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**00706/VIO/1/003- Do you agree with the Objectives for the RLDP? If not, how and why do you think they should be changed?**

<b>Comment</b>	<b>Officer Response</b>
<p>Please refer to the attached additional information Attached Infomation: In general terms we are supportive of the overall approach towards the objectives, however, we believe that particular attention is needed with regards to economic and population / community objectives. As we have stated earlier, there are significant challenges ahead and it must be the role of the planning process to help address these issues rather than constrain recovery and realignment. We are strongly of the view that well planned urban extensions can contribute towards a range of the key objectives not just in respect of population and communities, inclusive of:</p> <ul style="list-style-type: none"> <li>o a variety of housing types, tenures and densities along with neighbourhood centres with mixed uses and a range of facilities.</li> <li>o providing a landscape structure that builds on existing assets, including green infrastructure within the development, linking urban areas to the countryside beyond and creating a distinctive edge to the urban area.</li> <li>o providing opportunities for people to work locally and for small businesses to set up, grow and thrive.</li> <li>o presenting an opportunity to design energy efficient communities.</li> </ul>	<p>- Support and comments provided on urban extensions noted. Economy and Employment: - We believe that the Objective as currently drafted appropriately accommodates the points raised. Further consideration will be given to more specific matters as policy development progresses. Population and Communities: - The Vision and Objective as currently drafted already reflect Newport's role as a National Growth Area. The Growth and Spatial Options stage will explore in further detail the matters raised.</p>

o allowing pedestrian, cycle and public transport networks to be fully integrated, often improving services available to the adjacent communities, increasing health and well-being by reducing the reliance on cars

o supporting the surrounding communities by offering facilities not available locally and by providing affordable housing for people in the care and support sectors they can ensure that the elderly can continue to live independently amongst friends and family reducing the costs of providing social and nursing care.

With regards to specific objectives:

Economy & Employment -

We are supportive of the approach towards employment land in general and the principles of the objective. However, as stated previously it is clear that economic restructuring and re-alignment will be a significant aspect of the replacement plan period. Flexible and innovative ways of approaching this will be required. Indeed, there has already been a shift in recent years in employment patterns and requirements, as such we would expect numerous trends to be reflected in the strategy. For example:

- o working from home is a key change with the Welsh Government seeking to achieve 30% of the workforce working from home, this has opportunities for local sustainability but also for larger centres such as Newport City Centre that will need to be considered;
- o there should be some recognition of non office based home working needs such as in respect of tradespersons (eg plumbers, carpenters etc) storage arrangements;
- o Non B-uses ought to be considered as an important means of achieving employment requirements; and
- o a significant amount of economic restructuring has already taken place over the past two years, particularly in respect of the need for more warehousing and distribution facilities associated with home deliveries, online retail and Brexit arrangements. South Wales has traditionally lost out on investment opportunities associated with such uses (given the facilities available at Severnside) however, it is considered likely

<p>that Newport will need to accommodate such uses to capitalise upon opportunities and to complement its approach to sustainability.</p> <p>Population &amp; Communities</p> <p>As stated previously our clients are strongly of the view that it will be important to ensure a suitable supply of housing land is identified in order to meet needs. Indeed, It will be of utmost importance to ensure Newport establishes a level of growth that meets needs and does not exacerbate the existing supply constraints in South Wales. Rather we are of the view that a high level of growth will need to be set in order to meet the Vision and fulfil the strategic aspirations for Newport as a Gateway City to Wales. In this regard it is noted:</p> <ul style="list-style-type: none"> <li>o given the potential impacts of Covid 19 on the economy and society, there will be a need for a highly ambitious strategy to be adopted which provides far greater flexibility to respond to the crisis through added stimulation of the construction sector; and</li> <li>o account should be taken in the baseline figures of the levels of sustainability and self containment that can be achieved through embracing working from home trends for those sectors where it is feasible. These are often the high added value jobs that are no longer tied to cities such as Bristol or Cardiff but can retain expenditure in the local area and encourage vibrant local areas.</li> </ul>	
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**00706/VIO/1/004 - Any other comments**

<b>Comment</b>	<b>Officer Response</b>
<p>Please refer to the attached additional information</p> <p>Attached Information:</p> <p>It is noted that our clients are happy to liaise with the Council on sites that they are either involved with currently or are looking to establish an interest in. Indeed, early engagement can help to ensure that resources are</p>	<p>Candidate Site assessments are occurring separately and any discussions necessary will be undertaken as part of that process.</p>

**[NB Sentence not competed in original document]**



**Date Acknowledged:** 25.03.2022

**Date Received:** 25.03.2022

**00659/VIO/3/001 - Do you agree with the Vision for the RLDP? If not, how and why do you think it should be changed?**

Comment	Officer Response
<p>We support the Vision of the RLDP. In particular we comment on the following aspects of the Vision below:</p> <ul style="list-style-type: none"><li>- A strategically significant City which will contribute towards the national growth of Wales.</li></ul> <p>We support this aspect of the Vision. Future Wales identifies Newport as a National Growth Area. The Welsh Government is determined to see development and growth in Newport, allowing the city to fulfil its potential as a second focal point for the region. Growth at Newport will help manage the development pressures in the region by providing a strategic growth focus for the eastern part of the area.</p> <ul style="list-style-type: none"><li>- A City that tackles inequality through sustainable patterns of development, creating places that are safe, connected, inclusive, healthy, and well designed with access to housing, jobs and services.</li></ul> <p>We support this aspect of the Vision. The Local Development Plan should consider how prosperity can be spread across the region, how the local economy can be strengthened and how growth in Newport can benefit the whole region.</p> <p>Strategic growth including housing delivery should be focused on land in and immediately adjoining Newport itself, such as at land at Ridgeway, Allt yr yn, promoted by W&amp;M McDonald (Pencarn Farms) Ltd.</p> <ul style="list-style-type: none"><li>- An economically thriving City which supports and attracts business and industry at all scales, particularly where they focus on sustainable, innovative and technologically leading practices, which contribute towards cultivating a skilled and adaptable workforce.</li></ul> <p>We support this aspect of the Vision. The Local Development Plan should consider how it can help deliver development which supports the regional economy and local communities.</p> <ul style="list-style-type: none"><li>- A resilient City which sustainably manages its natural resources, protecting and enhancing the biological and ecological values of the</li></ul>	<p>- Support noted.</p>

<p>natural environment, including the benefits of ecosystem services, in a carbon neutral and climate responsible manner.</p> <p>We support this aspect of the Vision. In urban areas, the enhancement (net benefit) of biodiversity and the provision of green infrastructure should shape growth and be fully integrated as part of location and design solutions for proposed development. This has been demonstrated in detail as deliverable in the candidate sites submission promoted by W&amp;M McDonald (Pencarn Farms) Ltd at land at Ridgeway, Allt yr yn.</p>	
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**00659/VIO/3/002 - Do you agree with the issues identified? If not, how and why do you think they should be changed?**

<b>Comment</b>	<b>Officer Response</b>
<p>With specific regard to many of the key issues raised in the RLDP we comment as follows:</p> <ul style="list-style-type: none"> <li>- How will the Plan support the nationally important role of Newport's economy as identified in Future Wales?</li> </ul> <p>Future Wales (FW) highlights the delivery of housing as a critically important economic issue in all parts of Wales. Cardiff, Newport and Valleys is a FW National Growth Area. It must be the main focus for growth and investment in the South-East region.</p> <p>The plan must seek to deliver housing at requisite numbers, in the right areas. It should seek the delivery of a variety of housing. This is to ensure places are socially mixed and cater for varied lifestyles, with space that allows for homeworking. Urban growth and regeneration should cater for families, couples and single people of different ages, as well as providing a mix of affordable and private housing.</p> <p>The Plan must deliver policies to locate major generators of travel demand, such as housing, employment, retailing, leisure and recreation, and community facilities (including libraries, schools, doctor's surgeries and hospitals), within existing urban areas or areas which are, or can be, easily reached by walking or cycling, and are well served by public transport. (PPW, para 3.50)</p> <p>Development in the countryside (beyond settlement boundaries) should be located within and adjoining those settlements where it can best</p>	<ul style="list-style-type: none"> <li>- Points regarding how the plan can support growth within Newport are noted.</li> <li>- Points regarding the need to utilise green infrastructure and nature-based solutions is noted.</li> <li>- Candidate Site assessments are being carried out as part of a separate process. The results of this assessment will be published at a later stage.</li> </ul>

be accommodated in terms of infrastructure, access, habitat and landscape conservation.

Infilling or minor extensions to existing settlements

may be acceptable, in particular where they meet a local need for affordable housing or it can be demonstrated that the

proposal will increase local economic activity. All new development should be of a scale and design that respects the character of the surrounding area.

Candidate sites for housing which are sustainable, deliverable and financially viable should be included in the RLDP and delivered without delay.

The above issues are considered in detail in the candidate sites submission promoted by W&M McDonald (Pencarn Farms) Ltd at land at Ridgeway, Allt yr yn. The delivery of which for housing will support the nationally important role of Newport's economy identified in Future Wales.

- How should the plan support the provision and enhancement of green infrastructure networks

- How can the plan ensure impacts on designated and important biodiversity sites, habitats and species are positive and result in net gains?

- How can the plan protect and enhance ecological networks, including those that cross administrative boundaries?

- How can the plan promote the resilience of ecosystems?

W&M McDonald (Pencarn Farms) Ltd supports the need to maximise the use of Green Infrastructure and nature-based solutions as part of shaping urban growth and housing delivery.

Development should be delivered with biodiversity as an integral consideration of any development. This is achievable at land at Ridgeway, Allt yr yn.

Ecological strategies should focus on retention and enhancement of habitats of ecological value including the provision of a detailed green infrastructure. Public space should be delivered and where appropriate be left unmanaged to deliver enhanced on-site biodiversity benefit.

<p>Opportunities for planting and providing ecological corridors should be seized and the loss of habitats compensated. At land at Ridgeway, which lies adjacent to Allt yr yn Local Nature Reserve, GI enhancement is proposed through the transfer of land to Newport CC.</p>	
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**00659/VIO/3/003 - Do you agree with the Objectives for the RLDP? If not, how and why do you think they should be changed?**

<b>Comment</b>	<b>Officer Response</b>
<p>We support the identified objectives for the RLDP, in particular the following:            Population and Communities - Provide high-quality homes that meet the needs of Newport, as a national growth area, and to ensure that these homes are supported by the necessary infrastructure to provide safe and healthy places that maintain and enhance community and settlement identities.            W&amp;M McDonald (Pencarn Farms) Ltd has submitted to Newport CC candidate sites promoting land at Ridgeway, Allt yr yn to provide high quality homes which meets the needs of Newport. The submissions demonstrate the land lies at a sustainable location on the edge of the existing settlement and can readily deliver housing growth. Land is in sole ownership of the Site Proposer who has unconstrained access            In accordance with the Welsh Government's Placemaking Objectives the land would provide homes in the right place and create sustainable, well-designed, and high-quality homes, where people want to live.            Health and Well-being - To improve health and well-being through the creation of well-connected, accessible, healthy and active places, tackling health and socio-economic inequality through sustainable growth.            Land at Ridgeway is demonstrated to be well connected and highly accessible by walking and cycling without the need for use of a private car. Delivery of the land will create genuine opportunities for future residents of the site to improve health and well-being by travelling sustainably.            Biodiversity and Geodiversity - To maintain, enhance and improve the biodiversity and geodiversity of Newport and its surrounds, including</p>	<p>- Support noted, in particular the Population and Communities; Health and Well-being; Biodiversity and Geodiversity; Landscape; and Climate Change Objectives.            - Candidate Site assessments are being carried out as part of a separate process. The results of this assessment will be published at a later stage.</p>

improved resilience, diversity, connectivity and adaptability, whilst ensuring net benefits are facilitated from development.

There are no fundamental biodiversity constraints which may preclude delivery of land at Ridgeway for housing. The site is unused; it is not at risk of flooding. There are no ecological constraints and or near the land which cannot be appropriately mitigated. Biodiversity benefit is demonstrably achievable.

Landscape - To protect and enhance the quality and character of Newport's landscape, townscape and seascape, and maximise the opportunities these features offer.

At land at Ridgeway, existing site features including trees/hedgerows can be retained and incorporated positively into any site layout. The landscape of the site and surrounding area has been reviewed. Adjoining land uses are highly compatible. The addition of built form in this area would not notably alter the character of its immediate setting, and with careful positioning, scale and density of built form and the use of screen planting in this area, the character of the surrounding area would not be compromised through housing delivery.

Climate Change - To ensure that development and land uses in Newport are resilient to the effects of climate change, and actively tackle the causes and impacts of climate change through minimisation, adaptation and mitigation.

At land at Ridgeway, we would anticipate any development will incorporate low-energy modelling and the use of sustainable materials, with future-proofed with facilities such as electric car charging. The aim would be to exceed the energy efficiency and build-quality requirements of current Welsh Building Regulations.

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**Natural Resources Wales - 00004**

**Date Acknowledged:** 25.03.2022

**Date Received:** 24.03.2022

**Summary of Comment 00004/VIO/4/003 - Do you agree with the Objectives for the RLDP? If not, how and why do you think they should be changed?**

Comment	Officer Response
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Draft Objective 3.1: Economy and Employment

We recommend that sustainable economic growth and circular economy are emphasised and that this wording is used consistently throughout. We would recommend that green skills/jobs are also referenced within the document.

Suggested wording to Objective 3.1: Economy and Employment (page 7):

Provide for Newport's sustainable economic growth and circular economy by offering a diverse range and choice of new and improved employment opportunities, which are adaptive to change and meet the needs of Newport and beyond, supporting a strong skilled and resilient workforce.

Draft Objective 3.2: Population and Communities

We welcome reference to environment infrastructure in the draft objective. The requirement for new development to deliver green infrastructure will deliver multiple benefits linking to other LDP objectives. It is identified that currently there is a limited supply of brownfield sites and there is likely to be a role for greenfield sites in meeting the housing needs and growth aspirations of the next plan. It should be noted that Future Wales Policy 33 states "Growth at Newport will help manage the development pressures in the region by providing strategic growth focus for the Eastern part of the area. Strategic growth should be focused in and immediately adjoining Newport itself, to support brownfield regeneration." We advise further consideration is given to how this objective can meet the Future Wales policy and recommend that if greenfield sites are chosen, that these are the least biodiverse and have fewer natural features. If it's proposed to use greenfield sites to meet the housing needs and growth aspirations, the RLDP should assess these sites in the context of natural resources. We would be happy to discuss this further, providing advice on the relevant criteria to use in any analysis.

Key Issues

We welcome the acknowledgement of the issue to identify the most sustainable locations for urban expansion. Planning Policy Wales states

- Collectively, the Vision and Objectives as drafted serve to outline how the RLDP will achieve sustainable development, as underpinned by overarching national planning policy. Therefore, regular inclusion of the word "sustainability" or "sustainable" across the Vision, Issues and Objectives is not considered necessary.

- Comments regarding additional references to the "circular economy" and "green skills/jobs" are noted. It is considered that whilst this could be referenced across multiple Objectives, it is most appropriate under the Natural Resources Objective as currently drafted recognising the specific matters likely to be addressed through the framework of the RLDP. Further consideration will be given to this matter as the plan progresses to the policy development stage.

- Support noted for Population and Communities objective, particularly the reference to environment infrastructure. The levels and locations of growth required will be explored in further detail at the Growth and Spatial Options stage to come.

- Support for the Health and Well-being Objective is noted, particularly reference to access to green space and air quality. The significance of green infrastructure and its link to health and well-being is noted. In our view, this has appropriately been reflected within the Natural Resources Objective and Biodiversity and Geodiversity Objective. The additional information and resources referenced will be considered as the plan progresses.

that development should be located so that it can be well serviced by existing or planned infrastructure. In general, this will involve maximising the use of existing infrastructure or considering how the provision of infrastructure can be effectively co-ordinated to support development plans. Infrastructure choices should support decarbonisation, socially and economically connected places and the sustainable use of natural resources.

This is also supported by NRW's State of Natural Resources Report (SoNaRR) for Wales 2020 which identifies that development within the existing urban boundary should be favoured over those allowing development in the hinterland beyond that boundary because of the effect upon the energy subsystem. For example, suburban sprawl characterised by low population densities is substantially less energy efficient than one which seeks to pursue a higher density path.

We welcome the identification of environmental infrastructure as a key issue. The potential for Green Infrastructure (GI) to deal with multiple issues identified in the document and the multiple benefits that can be derived from GI are an important consideration for the plan. GI also provides the opportunity to weave the natural environment into an urban setting.

#### Draft Objective 3.3: Health and Well-being

We welcome the identification of access to open and green spaces in this objective. The development plan process is an important mechanism in delivering multi-functional GI which encompasses open and green spaces. The importance of existing spaces and the creation of new space links to the 'Healthy Active Connected' theme in the South East AS. Good quality surroundings enable people to be more physically active, feel safe and secure, use facilities and services and socialise and play. These factors support good physical and mental health and well-being.

We welcome the identification of the role of the planning process in dealing with air quality issues. Air quality alongside other forms of pollution is identified as a key risk to the health of our ecosystems and human health (as set out in the 'Linking our Landscapes' theme of the

- In our view, the current drafting of the Natural Resources Objective, along with all the other Objectives read as a whole, satisfy the four aims of sustainable management of natural resources. No further changes considered necessary in this regard. Support noted of reference to soil and water quality. The additional information, including the status of Newport's waterbodies, and resources referenced are noted and will be considered as the plan progresses.

- The recommended change to the Biodiversity and Geodiversity Objective are noted and agreed in part. It is not considered necessary for reference of the "nature emergency" to be included in the Objective itself, as it can more appropriately be discussed in any supporting text without limiting the scope of the Objective. The additional information, including points on language used in supporting text, and resources referenced are noted and will be considered as the plan progresses.

- Noted. Our view is that matters of natural heritage are more appropriately captured under the Biodiversity and Geodiversity Objective and the Landscape Objective.

-We note the importance of considering landscape scale and will do so as the plan progresses. We also note the varied benefits and approaches to considering landscape areas. In our view the Landscape Objective as drafted is appropriate, and the Biodiversity and

AS).

We recommend that reference is made to the importance of natural resources in the context of this theme. Natural resources are our lifesupport systems, so it is vitally important that they are in good condition. Alongside providing for our essential needs including food, clean water, fuel, aggregate and timber, there are less obvious ways natural resources contribute to well-being, including by helping to regulate carbon by locking it away, providing flood protection by managing water in the landscape and supporting our capacity to adapt to climate change. This highlights the cross-cutting nature of the sustainable management of natural resources.

Issues

We welcome the identification of the provision and enhancement of GI, accessible natural greenspaces, provision of sustainable travel options, reduction in the need to travel and the impact of development on air quality as key issues for the plan to tackle.

We would direct you to the Gwent Well-being Assessment as a valuable source of evidence in relation to this objective.

Draft Objective 3.4: Equality, Diversity and Inclusion

Key Issues

It should be identified in the key issues section that access to nature (or lack of) contributes to inequalities. High quality GI and access to nature in deprived neighbourhoods can help improve resilience and reduce health inequalities. For further information please refer to SoNaRR2020 Aim 3 assessment ([cyfoethnaturiol.cymru](http://cyfoethnaturiol.cymru)).

Draft Objective 3.5: Transport and Movement

Key Issues

We welcome the identification of the need for the plan to facilitate sustainable travel choices, reduction of travel and for travel choices to have a positive effect on air quality health and climate change. These issues link to the 'Linking our Landscapes', 'Climate Ready Gwent', and 'Healthy Active Connected' themes of the AS. We recommend that reference be made to the opportunities for active travel routes to

Geodiversity Objective appropriately addresses some of the other points raised. The additional information and resources referenced are noted and will be considered as the plan progresses. We will continue to engage with stakeholders on such matters also. - Support noted for the Climate Change Objective, and reference to flood risk, carbon capture and storage as key issues. We note the need to consider the ability of new development to reduce flood risk for existing communities and will be considered as the plan progresses in line with national policy.



provide multiple GI benefits e.g. tree planting, enhancing biodiversity etc.

#### Draft Objective 3.6: Natural Resources

We recommend you consider whether the draft objective incorporates or references the four aims of sustainable management of natural resources (SMNR) (as set out in SoNaRR (2020)):

Aim 1. Stocks of Natural Resources are Safeguarded and Enhanced

Aim 2. Ecosystems are Resilient to Expected and Unforeseen Change

Aim 3. Wales has Healthy Places for People, Protected from Environmental Risks

Aim 4. Contributing to a Regenerative Economy, Achieving Sustainable Levels of Production and Consumption

We welcome acknowledgement of the SoNaRR and South East AS as key parts of the Replacement Local Development Plan (RLDP)

evidence base. We also note acknowledgement of the issue of air quality in Newport. We would direct you to the Gwent Well-being

Assessment (GWA) as a valuable source of evidence in relation to this objective. The Environmental well-being section of the GWA

considers the extent to which the sustainable management of natural resources is being achieved, by combining local, regional, and national

evidence to better understand the performance of the natural environment against the four aims of SMNR (referred to above).

We also welcome the acknowledgement of the following:

1. Soil - Fully functioning soils provide rich biodiversity, sequester and maintain carbon, slow the flow of water, help to regulate the climate and air quality, and produce a sustainable supply of food, fibre and timber. The way land and soils are used can deliver several functions or services at the same time and place, providing multiple benefits.

2. Water Quality - This will be an important issue for the plan to respond to as the policy framework develops.

We suggest the following wording replaces the sentence 'In terms of water quality...' under the first bullet point on page 18 (current situation for objective 3.6 Natural Resources)

In terms of water quality, all water bodies in Newport fail to achieve the objective of 'good status' under the Water Framework Directive with

the vast majority having an overall status of 'moderate' meaning work is required to improve the water environment for the ecology and people of Newport.

This is based on the publication of 2021 WFD classifications.

3. Air Quality - This is important in the relation to the impact upon sensitive ecological receptors, as well as the implications for human health.

Key Issues

We recommend that the need to negate the impact of development on water quality is an important issue that should be referenced in the 'key issues' section. In addition, consideration of aerial impacts on sensitive receptors such as Saltmarsh in the Severn Estuary should be referenced in this section.

Draft Objective 3.7: Biodiversity and Geodiversity

We recommend the draft objective is amended as set out below:

To maintain, enhance and improve the biodiversity and geodiversity of Newport and its surrounds including improved ecological resilience, diversity, connectivity and adaptability, whilst ensuring net benefits are facilitated from development in order to tackle the nature emergency.

NRW works to the definition of ecosystem resilience from the SoNaRR, which is "the capacity of ecosystems to deal with disturbances, either by resisting them, recovering from them, or adapting to them, whilst retaining their ability to deliver services and benefits now and in the future" (Disturbances are interpreted to mean pressures and demands on the ecosystem). Diversity, connectivity and adaptability are properties or emergent attributes of resilience (along with extent, condition, recovery and resistance). Reference to resilience in the objective captures all these attributes and emergent properties. For further information on Resilient Ecological Networks (REN) please refer to Terrestrial and freshwater Resilient Ecological Networks: a guide for practitioners in Wales. We recommend reference to the nature emergency be included in the objective to ensure that the policies linking to the objective have due regard to the urgent need to tackle this key challenge.

We note reference to priority habitats identified under the biodiversity plan in this section. These should align with relevant priority habitats identified in section 7 of the Environment (Wales) Act 2016.

We recommend the inclusion of 'resilience' in the below phrases to highlight the importance of resilience as an overarching aim (connectivity is an important attribute of ecosystem resilience). We note that all the attributes are referenced in the key issues section.

There are many priority habitats, urban and green spaces, coastal areas, and waterbodies that support overall ecological resilience, and connectivity in the plan area. It will be important for any new development to ensure that this ecological network is supported and enhanced both locally and sub-regionally.

New development is required to secure biodiversity enhancement and maximise opportunities for biodiversity net gain, whilst improving ecological resilience and connectivity, avoiding, minimising and mitigating harm.

Key Issues

We welcome acknowledgement of the importance of protecting and enhancing ecological networks, including those that cross administrative boundaries in this section. We are aware that work is underway on the Newport Green Infrastructure Strategy (GIS), which will provide an important evidence source to inform plan policies which seek to address this issue. We welcome acknowledgement of the importance of these networks across administrative boundaries. These links will be of relevance as the Strategic Development Plan, incorporating Newport CC, progresses. Green Infrastructure provides multiple benefits, and in line with the national planning context, resilient ecological networks (REN) form the foundation of GI networks. Resilient ecological networks are best placed to provide the multiple benefits of GI. For further guidance please refer to NRW Guidance Note 042 Green Infrastructure Assessment and Terrestrial and freshwater Resilient Ecological Networks: a guide for practitioners in Wales. We acknowledge that the LDP is at an early stage of development, however consideration of

these issues now can help to deliver an appropriate evidence base to inform effective policies delivering the intended outcomes on the ground.

One of the actions identified in the AS is to work together to develop, populate and use common data sets which will enable organisations to have access to baseline evidence relating to the resilience of our ecosystems. We would welcome the opportunity to work with NCC as the plan progresses to achieve this outcome. This work would also contribute to the development of a common evidence base for nature-based solutions to climate adaptation (a key issue identified in the draft objective on Climate Change).

We welcome acknowledgement of the role new or enhanced GI has to play in connectivity. Managed as part of a GI network, green spaces can deliver many benefits in the same place at the same time. GI refers to all the natural features which make life in our towns and cities possible and can provide wildlife habitats, regulate temperature, absorb flood water, reduce public exposure to air pollution, promote mental health, encourage healthy exercise and attract people to use active travel routes instead of their cars.

We welcome acknowledgement of the issue relating to resilience of ecosystems. This is a key issue identified within the AS. Please refer to the guidance above which will assist in understanding the issue and responding with an appropriate policy context. NRW would welcome an opportunity to further advise on this aspect of the LDP.

We note reference to the establishment of new GI corridors. We recommend that, in addition, reference is also made to how the plan can create more green sites protecting and increasing the space for nature for its own sake and for people's health and wellbeing.

Draft Objective 3.8: Historic Environment

We recommend that reference be made to natural heritage in this section to highlight the important role that nature plays alongside the built environment in the heritage of Newport.

Draft Objective 3.9: Landscape

A landscape scale approach was taken to producing the South East AS. This means that we have considered where and why we want to build ecosystem resilience in terms of the special and distinctive landscape areas of our place. Working in this way will allow us to address the increasingly complex and widespread environmental, social and political challenges that transcend traditional management boundaries.

We note the objective has focussed on the importance of the landscape in visual terms and within the context of providing a visual setting to the built environment. The South East AS seeks to identify opportunities for our protected sites, natural and built environments to contribute towards the resilience of wider priority habitat networks in the region. These opportunities for improving ecosystem resilience should support ecological connectivity between sites, across boundaries and at a landscape scale. We recommend that the key issues section identifies the importance of landscape scale consideration of these matters.

As part of the AS process, we have co-produced landscape profiles. These profiles provide a common evidence base which combines national and local evidence on the health of our ecosystems to help identify where we need to improve the health of our natural assets and why. They can be used to identify spatial and landscape scale opportunities for the delivery of the sustainable management of natural resources (SMNR).

The plan area is covered by the Newport, Gwent Levels, and Wye valley and Wentwood Landscape Profiles (it should be noted that the majority of the plan area is covered by the Newport Landscape Profile).

Whilst the priorities and recommendations identified in the profiles are relatively broad many of them are reflected in the visions document.

In brief the Newport profiles identifies the following priorities and recommendations:

-Connectivity - Habitat connectivity should be maintained and enhanced, building ecosystem resilience.

Opportunities - Using the existing evidence, and evidence provided in the future Green Infrastructure Assessment, identify opportunities to

build resilience. Recommend working alongside other urban areas for a joined-up approach. Areas that would provide multiple benefits should be prioritised. An example of this would be a community orchard that was located to improve the connectivity of a near-by woodland, that was also along an active travel route to a neighbouring school, located on a high-risk flood area. In terms of connectivity, the River Usk and generally, all water courses are considered key wildlife corridors.

-Wellbeing provision - Green space provision disproportionality benefits the health and wellbeing of low socio-economic groups. Therefore, these areas need to be prioritised for provision.

In brief the Gwent Levels profile identifies the following priorities in relation to development:

-Water - The location of the Gwent Levels results in high pressure for development. Strengthened protected site designation. Land use planners to encourage sympathetic development adjacent to drainage systems.

-Woodland - Development sites may be strategically important in relation to providing connectivity between existing areas of woodland. Planning including strengthened designation to protect habitat networks including woodland.-Urban environment including previously developed land - It is essential that new developments are designed with inbuilt resilience and must provide green infrastructure and open green spaces

In brief the Wye Valley and Wentwood profile identifies the following priorities in relation to development:

Decisions to ensure we maintain and enhance biodiversity and promote ecosystem resilience. Sites of Importance for Nature Conservation (SINC's) and Section 7 listed habitats and species will be appropriately recognised in the planning process and afforded the protection they require to avoid loss of biodiversity and ecosystem resilience.

We can provide further commentary on the opportunities identified in the profiles once more detail around the plan is available. Access to the profiles can be provided upon request.

Draft Objective 3.10: Climate Change

<p>We welcome acknowledgement of the key issue of flood risk, carbon capture and storage as a key issue, and acknowledgement of the key role that woodland plays in a Newport context. In relation to flood risk, it would be positive to reference new development reducing flood risk for existing communities as an issue for the Plan to address. This is in addition to striving to avoid locating new development within a flood zone.</p> <p>Key Issues</p> <p>Welcome the key issues identified in relation to this objective. The 'Climate Ready Gwent' theme in the AS seeks that biodiversity is protected, enhanced and resilient to a changing climate, water and air quality is good, soils are healthy and ecological connectivity is maximised. Nature-based solutions to climate adaptation contribute towards increase in local resilience to the impacts of climate change.</p>	
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**00004/VIO/4/004 - Any other comments**

<b>Comment</b>	<b>Officer Response</b>
<p>Further Advice</p> <p>Growth Levels</p> <p>We note that growth levels are not included as part of this consultation. We recommend that a range of issues are given appropriate consideration in the round as the LPA considers various growth options. Consideration should be given to the definition of growth and how it may be achieved whilst decarbonising rapidly. A valuable and interesting evidence source are the Carbon Budget Reports, prepared by the Tindell Centre for Climate Change Research.</p> <p>We would question whether setting medium and long-term economic targets in terms of GDP and GDP per capita is appropriate and we would encourage your authority to consider growth in terms of Welsh Government's commitment to a Well-being Economy. We recommend options be assessed against how they contribute to key challenges such as those identified in Future Wales, for example the climate and</p>	<p>- The Growth and Spatial Options stage to follow will explore growth levels in further detail.</p> <p>- Additional information and resources referenced are noted and will be considered as the plan progresses.</p>

nature emergencies, against the Well-being of Future Generations goals which provide a framework for encouraging inclusive Growth, and the SMNR aim of a regenerative economy (SONARR 2020).

Evidence Base

Green Infrastructure Assessment (GIA) - We would refer your authority to Guidance Note 042 Green Infrastructure Assessments (final June 2021 (sharepoint.com)). This document provides guidance with regards to the undertaking of a GIA. We would stress the important role that the GIA plays in the identification of resilient ecological networks. This evidence base can then be used to inform appropriate LDP policies which seek to safeguard and enhance resilient ecological networks.

For further guidance on resilient ecological networks see:

resilient-ecological-networks-practitioner-guide.pdf (cyfoethnaturiol.cymru)

SoNaRR 2020 - Assessment of the achievement of SMNR Aim 2: Resilient ecosystems (cyfoethnaturiol.cymru)

We trust our comments are beneficial and we would welcome further discussion on the comments made. We look forward to working with your Authority to ensure that the detail of the plan as it progresses provides a framework to tackle the issues and build upon the opportunities identified.

If you have any queries on the above, please do not hesitate to contact us.

Yn gywir / Yours faithfully

**00004/VIO/4/005 - Intro**

<b>Comment</b>	<b>Officer Response</b>
<p>Thank you for consulting Cyfoeth Naturiol Cymru / Natural Resources Wales about the above, which we received on 31 January 2022.</p> <p>We have reviewed the document entitled 'Newport Local Development Plan, Draft Vision, Issues and Objectives', prepared by your Authority, dated January 2022. We are broadly satisfied that the visions, issues and objectives identified and advise they align with the South East Wales Area Statement (AS). The following advice can help inform and develop the RLDP, specifically in shaping the Preferred Strategy.</p>	<p>Support noted.</p>



**00004/VIO/4/001 - Do you agree with the Vision for the RLDP? If not, how and why do you think it should be changed?**

Comment	Officer Response
<p>We welcome acknowledgement within the vision of the importance of the sustainable management of natural resources (SMNR). The South East Wales Area Statement (AS) states that to realise the benefits that nature can provide, our natural areas must be healthy and resistant to threats and disturbance. The capacity of natural resources to provide this function is called ecosystem resilience. Ecosystem resilience can be considered a measure of health. The healthier (or more resilient) the ecosystem is, the more likely it is to survive, thrive and benefit people and communities.</p> <p>We recommend the inclusion of references to nature and the natural environment to stress the importance of the natural environment throughout the draft vision. In addition, the aim of helping to deliver a local development plan that protects and enhances environmental interests and ensures long-term, sustainable development.</p> <p>We also recommend the addition of references to sustainable growth to align with the national legislative and policy context which seeks to secure healthy, resilient and productive ecosystems for the future whilst still meeting the challenges of creating jobs, housing and infrastructure. We note sustainable growth is referred to elsewhere in the document and recommend that this is used consistently throughout the plan.</p> <p>Suggested additions to the current draft vision text (page 4):</p> <ul style="list-style-type: none"> <li>-A strategically significant City which will contribute towards the national sustainable growth of Wales.</li> <li>-A City that tackles inequality through sustainable patterns of development, creating places that are safe, connected, inclusive, healthy and well designed with access to housing, jobs, services and nature.</li> <li>-A resilient City which sustainably manages its natural resources, protecting and enhancing the biological and ecological values of the</li> </ul>	<p>Support noted and information welcome.</p> <p>The Vision is to be read as a whole, with each point to be read in conjunction with the others. As such, the suggested revisions regarding "sustainable growth" and "weaving the natural environment into its urban setting" are not considered necessary, with the existing wording already encompassing this.</p> <p>The second point of the Vision will be amended to include reference to "the natural environment" to better emphasise the role of this in facilitating "sustainable patterns of development".</p>

natural environment, including the benefits of ecosystem services weaving the natural environment into its urban setting, in a carbon neutral and climate responsible manner.	
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**00004/VIO/4/002 - Do you agree with the issues identified? If not, how and why do you think they should be changed?**

Comment	Officer Response
<p>Draft Objective 3.1: Economy and Employment We recommend that sustainable economic growth and circular economy are emphasised and that this wording is used consistently throughout. We would recommend that green skills/jobs are also referenced within the document. Suggested wording to Objective 3.1: Economy and Employment (page 7): Provide for Newport's sustainable economic growth and circular economy by offering a diverse range and choice of new and improved employment opportunities, which are adaptive to change and meet the needs of Newport and beyond, supporting a strong skilled and resilient workforce.</p> <p>Draft Objective 3.2: Population and Communities We welcome reference to environment infrastructure in the draft objective. The requirement for new development to deliver green infrastructure will deliver multiple benefits linking to other LDP objectives. It is identified that currently there is a limited supply of brownfield sites and there is likely to be a role for greenfield sites in meeting the housing needs and growth aspirations of the next plan. It should be noted that Future Wales Policy 33 states "Growth at Newport will help manage the development pressures in the region by providing strategic growth focus for the Eastern part of the area. Strategic growth should be focused in and immediately adjoining Newport itself, to support brownfield regeneration." We advise further consideration is given to how this objective can meet the Future Wales policy and recommend that if greenfield sites are chosen, that these are the least biodiverse and have fewer natural features. If it's proposed to use greenfield sites to meet the housing needs and growth aspirations, the RLDP should</p>	<p>- Collectively, the Vision and Objectives as drafted serve to outline how the RLDP will achieve sustainable development, as underpinned by overarching national planning policy. Therefore, regular inclusion of the word "sustainability" or "sustainable" across the Vision, Issues and Objectives is not considered necessary.</p> <p>- Comments regarding additional references to the "circular economy" are noted. It is considered that whilst this could be referenced across multiple Objectives, it is most appropriate under the Natural Resources Objective as currently drafted recognising the specific matters likely to be addressed through the framework of the RLDP. Further consideration will be given to this matter as the plan progresses to the policy development stage.</p> <p>- The allocation of land under the RLDP will be assessed in accordance with the Candidate Site Methodology, national planning policy and in consultation with the relevant stakeholders. The comments and information provided are noted and ongoing discussions are welcomed.</p> <p>- Support for the Health and Well-being Key Issues are noted. The additional information and resources referenced will be considered as the plan progresses.</p>

assess these sites in the context of natural resources. We would be happy to discuss this further, providing advice on the relevant criteria to use in any analysis.

#### Key Issues

We welcome the acknowledgement of the issue to identify the most sustainable locations for urban expansion. Planning Policy Wales states that development should be located so that it can be well serviced by existing or planned infrastructure. In general, this will involve maximising the use of existing infrastructure or considering how the provision of infrastructure can be effectively co-ordinated to support development plans. Infrastructure choices should support decarbonisation, socially and economically connected places and the sustainable use of natural resources.

This is also supported by NRW's State of Natural Resources Report (SoNaRR) for Wales 2020 which identifies that development within the existing urban boundary should be favoured over those allowing development in the hinterland beyond that boundary because of the effect upon the energy subsystem.

We welcome the identification of environmental infrastructure as a key issue. The potential for Green Infrastructure (GI) to deal with multiple issues identified in the document and the multiple benefits that can be derived from GI are an important consideration for the plan. GI also provides the opportunity to weave the natural environment into an urban setting.

#### Draft Objective 3.3: Health and Well-being

We welcome the identification of access to open and green spaces in this objective. The development plan process is an important mechanism in delivering multi-functional GI which encompasses open and green spaces. The importance of existing spaces and the creation of new space links to the 'Healthy Active Connected' theme in the South East AS. Good quality surroundings enable people to be more physically active, feel safe and secure, use facilities and services and socialise and play. These factors support good physical and mental health and well-being.

- Note the link between access to green infrastructure and inequality. In our view this has been appropriately captured under other

Objectives. The additional information and resources referenced will be considered as the plan progresses.

- Support for the Transport and Movement Key Issues are noted. We also note the opportunity for active travel routes to provide multiple

green infrastructure benefits. In our view, this has been appropriately captured under the Biodiversity and Geodiversity Objective. The additional information and resources referenced will be considered as the plan progresses.

- Agree with the recommended emphasis on water quality and air quality impacts on environmental features within the Key Issues.

- Support noted for the Biodiversity and Geodiversity Key Issues, in particular reference to cross boundaries matters. The significance regarding green infrastructure and nature space generally is noted and will continue to be considered along with the additional information

provided as the plan progresses. We will continue to liaise with relevant stakeholders on these matters also.

- Support noted for the Climate Change Key Issues. The information and resources referenced will be considered as the plan progresses.

We welcome the identification of the role of the planning process in dealing with air quality issues. Air quality alongside other forms of pollution is identified as a key risk to the health of our ecosystems and human health (as set out in the 'Linking our Landscapes' theme of the AS).

We recommend that reference is made to the importance of natural resources in the context of this theme. Natural resources are our lifesupport systems, so it is vitally important that they are in good condition. Alongside providing for our essential needs including food, clean water, fuel, aggregate and timber, there are less obvious ways natural resources contribute to well-being, including by helping to regulate carbon by locking it away, providing flood protection by managing water in the landscape and supporting our capacity to adapt to climate change. This highlights the cross-cutting nature of the sustainable management of natural resources.

#### Key Issues

We welcome the identification of the provision and enhancement of GI, accessible natural greenspaces, provision of sustainable travel options, reduction in the need to travel and the impact of development on air quality as key issues for the plan to tackle.

We would direct you to the Gwent Well-being Assessment as a valuable source of evidence in relation to this objective.

#### Draft Objective 3.4: Equality, Diversity and Inclusion

##### Key Issues

It should be identified in the key issues section that access to nature (or lack of) contributes to inequalities. High quality GI and access to nature in deprived neighbourhoods can help improve resilience and reduce health inequalities. For further information please refer to SoNaRR2020 Aim 3 assessment ([cyfoethnaturiol.cymru](http://cyfoethnaturiol.cymru)).

#### Draft Objective 3.5: Transport and Movement

##### Key Issues

We welcome the identification of the need for the plan to facilitate sustainable travel choices, reduction of travel and for travel choices to

have a positive effect on air quality health and climate change. These issues link to the 'Linking our Landscapes', 'Climate Ready Gwent', and 'Healthy Active Connected' themes of the AS. We recommend that reference be made to the opportunities for active travel routes to provide multiple GI benefits e.g. tree planting, enhancing biodiversity etc.

#### Draft Objective 3.6: Natural Resources

We recommend you consider whether the draft objective incorporates or references the four aims of sustainable management of natural resources (SMNR) (as set out in SoNaRR (2020)):

Aim 1. Stocks of Natural Resources are Safeguarded and Enhanced

Aim 2. Ecosystems are Resilient to Expected and Unforeseen Change

Aim 3. Wales has Healthy Places for People, Protected from Environmental Risks

Aim 4. Contributing to a Regenerative Economy, Achieving Sustainable Levels of Production and Consumption

We welcome acknowledgement of the SoNaRR and South East AS as key parts of the Replacement Local Development Plan (RLDP)

evidence base. We also note acknowledgement of the issue of air quality in Newport. We would direct you to the Gwent Well-being

Assessment (GWA) as a valuable source of evidence in relation to this objective. The Environmental well-being section of the GWA

considers the extent to which the sustainable management of natural resources is being achieved, by combining local, regional, and national

evidence to better understand the performance of the natural environment against the four aims of SMNR (referred to above).

We also welcome the acknowledgement of the following:

1. Soil - Fully functioning soils provide rich biodiversity, sequester and maintain carbon, slow the flow of water, help to regulate the climate and air quality, and produce a sustainable supply of food, fibre and timber. The way land and soils are used can deliver several functions or services at the same time and place, providing multiple benefits.

2. Water Quality - This will be an important issue for the plan to respond to as the policy framework develops.

We suggest the following wording replaces the sentence 'In terms of water quality...' under the first bullet point on page 18 (current situation for objective 3.6 Natural Resources)

In terms of water quality, all water bodies in Newport fail to achieve the objective of 'good status' under the Water Framework Directive with the vast majority having an overall status of 'moderate' meaning work is required to improve the water environment for the ecology and people of Newport.

This is based on the publication of 2021 WFD classifications.

3. Air Quality - This is important in the relation to the impact upon sensitive ecological receptors, as well as the implications for human health.

Key Issues

We recommend that the need to negate the impact of development on water quality is an important issue that should be referenced in the 'key issues' section. In addition, consideration of aerial impacts on sensitive receptors such as Saltmarsh in the Severn Estuary should be referenced in this section.

Draft Objective 3.7: Biodiversity and Geodiversity

We recommend the draft objective is amended as set out below:

To maintain, enhance and improve the biodiversity and geodiversity of Newport and its surrounds including improved ecological resilience, diversity, connectivity and adaptability, whilst ensuring net benefits are facilitated from development in order to tackle the nature emergency.

NRW works to the definition of ecosystem resilience from the SoNaRR, which is "the capacity of ecosystems to deal with disturbances, either by resisting them, recovering from them, or adapting to them, whilst retaining their ability to deliver services and benefits now and in the future" (Disturbances are interpreted to mean pressures and demands on the ecosystem).

Diversity, connectivity and adaptability are properties or emergent attributes of resilience (along with extent, condition, recovery and resistance). Reference to resilience in the objective captures all these attributes and emergent properties. For further information on Resilient Ecological Networks (REN) please refer to

Terrestrial and freshwater Resilient Ecological Networks: a guide for practitioners in Wales.

We recommend reference to the nature emergency be included in the objective to ensure that the policies linking to the objective have due regard to the urgent need to tackle this key challenge.

We note reference to priority habitats identified under the biodiversity plan in this section.

These should align with relevant priority habitats identified in section 7 of the Environment (Wales) Act 2016.

We recommend the inclusion of 'resilience' in the below phrases to highlight the importance of resilience as an overarching aim (connectivity is an important attribute of ecosystem resilience). We note that all the attributes are referenced in the key issues section.

There are many priority habitats, urban and green spaces, coastal areas, and waterbodies that support overall ecological resilience, and connectivity in the plan area. It will be important for any new development to ensure that this ecological network is supported and enhanced both locally and sub-regionally.

New development is required to secure biodiversity enhancement and maximise opportunities for biodiversity net gain, whilst improving ecological resilience and connectivity, avoiding, minimising and mitigating harm.

Key Issues

We welcome acknowledgement of the importance of protecting and enhancing ecological networks, including those that cross administrative boundaries in this section. We are aware that work is underway on the Newport Green Infrastructure Strategy (GIS), which will provide an important evidence source to inform plan policies which seek to address this issue. We welcome acknowledgement of the importance of these networks across administrative boundaries. These links will be of relevance as the Strategic Development Plan, incorporating Newport CC, progresses. Green Infrastructure provides multiple benefits, and in line with the national planning context, resilient ecological networks (REN) form the foundation of GI networks. Resilient ecological networks are best placed to provide the multiple benefits of GI. For further

guidance please refer to NRW Guidance Note 042 Green Infrastructure Assessment and Terrestrial and freshwater Resilient Ecological Networks: a guide for practitioners in Wales. We acknowledge that the LDP is at an early stage of development, however consideration of these issues now can help to deliver an appropriate evidence base to inform effective policies delivering the intended outcomes on the ground.

One of the actions identified in the AS is to work together to develop, populate and use common data sets which will enable organisations to have access to baseline evidence relating to the resilience of our ecosystems. We would welcome the opportunity to work with NCC as the plan progresses to achieve this outcome. This work would also contribute to the development of a common evidence base for nature-based solutions to climate adaptation (a key issue identified in the draft objective on Climate Change).

We welcome acknowledgement of the role new or enhanced GI has to play in connectivity. Managed as part of a GI network, green spaces can deliver many benefits in the same place at the same time. GI refers to all the natural features which make life in our towns and cities possible and can provide wildlife habitats, regulate temperature, absorb flood water, reduce public exposure to air pollution, promote mental health, encourage healthy exercise and attract people to use active travel routes instead of their cars.

We welcome acknowledgement of the issue relating to resilience of ecosystems. This is a key issue identified within the AS. Please refer to the guidance above which will assist in understanding the issue and responding with an appropriate policy context. NRW would welcome an opportunity to further advise on this aspect of the LDP.

We note reference to the establishment of new GI corridors. We recommend that, in addition, reference is also made to how the plan can create more green sites protecting and increasing the space for nature for its own sake and for people's health and wellbeing.

Draft Objective 3.8: Historic Environment



We recommend that reference be made to natural heritage in this section to highlight the important role that nature plays alongside the built environment in the heritage of Newport.

#### Draft Objective 3.9: Landscape

A landscape scale approach was taken to producing the South East AS. This means that we have considered where and why we want to build ecosystem resilience in terms of the special and distinctive landscape areas of our place. Working in this way will allow us to address the increasingly complex and widespread environmental, social and political challenges that transcend traditional management boundaries.

We note the objective has focussed on the importance of the landscape in visual terms and within the context of providing a visual setting to the built environment. The South East AS seeks to identify opportunities for our protected sites, natural and built environments to contribute towards the resilience of wider priority habitat networks in the region. These opportunities for improving ecosystem resilience should support ecological connectivity between sites, across boundaries and at a landscape scale. We recommend that the key issues section identifies the importance of landscape scale consideration of these matters.

As part of the AS process, we have co-produced landscape profiles. These profiles provide a common evidence base which combines national and local evidence on the health of our ecosystems to help identify where we need to improve the health of our natural assets and why. They can be used to identify spatial and landscape scale opportunities for the delivery of the sustainable management of natural resources (SMNR).

The plan area is covered by the Newport, Gwent Levels, and Wye valley and Wentwood Landscape Profiles (it should be noted that the majority of the plan area is covered by the Newport Landscape Profile).

Whilst the priorities and recommendations identified in the profiles are relatively broad many of them are reflected in the visions document.

In brief the Newport profiles identifies the following priorities and recommendations:

-Connectivity - Habitat connectivity should be maintained and enhanced, building ecosystem resilience.

-Opportunities - Using the existing evidence, and evidence provided in the future Green Infrastructure Assessment, identify opportunities to build resilience. Recommend working alongside other urban areas for a joined-up approach. Areas that would provide multiple benefits should be prioritised. An example of this would be a community orchard that was located to improve the connectivity of a near-by woodland, that was also along an active travel route to a neighbouring school, located on a high-risk flood area. In terms of connectivity, the River Usk and generally, all water courses are considered key wildlife corridors.

-Wellbeing provision - Green space provision disproportionality benefits the health and wellbeing of low socio-economic groups. Therefore, these areas need to be prioritised for provision.

In brief the Gwent Levels profile identifies the following priorities in relation to development:

-Water - The location of the Gwent Levels results in high pressure for development. Strengthened protected site designation. Land use

planners to encourage sympathetic development adjacent to drainage systems.

-Woodland - Development sites may be strategically important in relation to providing connectivity between existing areas of woodland.

Planning including strengthened designation to protect habitat networks including woodland.

-Urban environment including previously developed land - It is essential that new developments are designed with inbuilt resilience and must provide green infrastructure and open green spaces

In brief the Wye Valley and Wentwood profile identifies the following priorities in relation to development:

Decisions to ensure we maintain and enhance biodiversity and promote ecosystem resilience. Sites of Importance for Nature Conservation

(SINC's) and Section 7 listed habitats and species will be appropriately recognised in the planning process and afforded the protection they require to avoid loss of biodiversity and ecosystem resilience.

<p>We can provide further commentary on the opportunities identified in the profiles once more detail around the plan is available. Access to the profiles can be provided upon request.</p> <p>Draft Objective 3.10: Climate Change</p> <p>We welcome acknowledgement of the key issue of flood risk, carbon capture and storage as a key issue, and acknowledgement of the key role that woodland plays in a Newport context. In relation to flood risk, it would be positive to reference new development reducing flood risk for existing communities as an issue for the Plan to address. This is in addition to striving to avoid locating new development within a flood zone.</p> <p>Key Issues</p> <p>Welcome the key issues identified in relation to this objective. The 'Climate Ready Gwent' theme in the AS seeks that biodiversity is protected, enhanced and resilient to a changing climate, water and air quality is good, soils are healthy and ecological connectivity is maximised. Nature-based solutions to climate adaptation contribute towards increase in local resilience to the impacts of climate change.</p>	
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**Home Builders Federation - 00522**

**Date Acknowledged:** 25.03.2022

**Date Received:** 25.03.2022

**00522/VIO/1/001 - Do you agree with the Vision for the RLDP? If not, how and why do you think it should be changed?**

<b>Comment</b>	<b>Officer Response</b>
<p>Yes, the HBF supports the vision and in particular the references to the need to provide homes for people to live.</p> <p>It is however suggested that the words 'across a range of tenures' could be added after the word housing in the second bullet point of the vision on page 4 of the document.</p>	<p>- Support noted. We believe the Vision in combination with the Objectives as currently drafted is appropriate. It is considered that the phrases "tackles inequality"; "inclusive"; "well designed" and "access to housing" already appropriately captures the point raised while remaining succinct.</p>

**00522/VIO/1/002 - Do you agree with the issues identified? If not, how and why do you think they should be changed?**

Comment	Officer Response
<p>The HBF makes the following comments:</p> <p>Economy and Employment - Should the question be 'how many jobs can Newport provide for rather than 'Newport Need'? Would the question 'Do we need a greater mix of residential uses in the centres?' be better phrased as 'how could the plan support a greater mix of residential uses in the centres?'</p> <p>Would the question 'How will the plan ensure that development takes place in sustainable locations, supported by the necessary social, environmental and physical infrastructure, including employment opportunities?' be better phrased 'how can the plan best support development to take place in sustainable locations.....'.</p> <p>Nature and Resources The HBF suggests that the wording needs to use the word 'balance' more often as it often the case that the need for development has to be balanced against the need for development.</p> <p>Climate Change The HBF is no clear on what is meant by 'How can the plan ensure that surface water drainage is considered appropriately alongside the Sustainable Drainage Systems (SuDS) process?' The requirement for SuDS to be used in new development is already in Welsh legislation so the plan does not need to do any more.</p>	<p>Economy and Employment: - Comments noted. The questions asked seek to inform the evidence base (Population and Economic Forecasts, Retail Study, Candidate Site Assessment) we must compile ahead of the Preferred Strategy</p> <p>- Growth levels for the RLDP will be considered in detail as part of the Growth and Spatial Options stage.</p> <p>Nature and Resources: - Comments noted. However, we believe the current phrasing is important to highlight the equal importance of each Objective and corresponding Issues.</p> <p>Climate Change: - This Issue relates to the importance of considering SuDS in the overall design of development, as opposed to the legislative requirements to obtain SAB approval. This Issue recognises the need for improved Green Infrastructure to support development and address Climate Change.</p>

**00522/VIO/1/003 - Do you agree with the Objectives for the RLDP? If not, how and why do you think they should be changed?**

Comment	Officer Response
<p>Yes, the HBF supports the Objectives, however on page 5 of the document within the Population and Communities section a reference to a 'range of tenures' would help particular as the National plan is so focused on affordable homes.</p> <p>The HBF suggests that it would benefit the document if a link between the need for a range of new homes and the wish to create new jobs</p>	<p>- Support noted. We believe the Objective as currently drafted is appropriate. The phrase "high-quality homes that meet the needs of Newport" already captures this point succinctly.</p>

<p>within the 'Economy and Employment' section was included.</p>	<p>- We believe the suggested reference of “new homes” in the Economy and Employment Objective is not necessary. Both the Economy and Employment Objective and the Population and Communities Objective seek to “meet the needs of Newport”. The specific needs for both of these objectives will be explored in further detail as part of the Growth and Spatial Options stage.</p>
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**WG Economy, Skills And Natural Resource - 00707**

**Date Acknowledged:** 25.03.2022

**Date Received:** 25.03.2022

**00707/VIO/1/001 - Do you agree with the Vision for the RLDP? If not, how and why do you think it should be changed?**

<b>Comment</b>	<b>Officer Response</b>
<p>A strategically significant City which will contribute towards the national growth of Wales. We support this aspect of the Vision. Future Wales identifies Newport as a National Growth Area. The Welsh Government is determined to see development and growth in Newport, allowing the city to fulfil its potential as a second focal point for the region. Growth at Newport will help manage the development pressures in the region by providing a strategic growth focus for the eastern part of the area.</p> <p>A City that tackles inequality through sustainable patterns of development, creating places that are safe, connected, inclusive, healthy, and well designed with access to housing, jobs and services.</p> <p>We support this aspect of the Vision. The Local Development Plan should consider how prosperity can be spread across the region, how the local economy can be strengthened and how growth in Newport can benefit the whole region. Strategic growth should be focused in and immediately adjoining Newport itself, to support brownfield regeneration.</p> <p>A City that promotes and protects its historic assets, diverse cultures and languages. We support this aspect of the Vision.</p>	<p>- Support noted.</p> <p>- We welcome the Welsh Government's support for development and growth in Newport to fulfill its potential as a second focal point for the region, and recognition of Newport's strategic role to help manage the development pressures in the region.</p> <p>- We note comments regarding the need to address regional contributions as part of the RLDP. The evidence base for the plan will consider regional matters where required.</p>

<p>An economically thriving City which supports and attracts business and industry at all scales, particularly where they focus on sustainable, innovative and technologically leading practices, which contribute towards cultivating a skilled and adaptable workforce.</p> <p>We support this aspect of the Vision. The university in Newport is an important presence in the region, providing further education, undertaking research and supporting innovation, providing employment, attracting students and supporting the local businesses and communities around them. The Local Development Plan should consider its role in the region and how it can play a bigger role in supporting the regional economy, innovation and their communities.</p> <p>A resilient City which sustainably manages its natural resources, protecting and enhancing the biological and ecological values of the natural environment, including the benefits of ecosystem services, in a carbon neutral and climate responsible manner.</p> <p>We support this aspect of the Vision. The Welsh Government wishes to see biodiversity enhanced and ecosystems become more resilient across the South East, including Newport. In urban areas, the enhancement (net benefit) of biodiversity and the provision of green infrastructure must both shape growth and be fully integrated as part of location and design solutions for proposed development.</p>	
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**00707/VIO/1/002 - Do you agree with the issues identified? If not, how and why do you think they should be changed?**

<b>Comment</b>	<b>Officer Response</b>
<p>Economy and Employment - we support the identified issues, specifically the following:</p> <p>-How will the Plan support the nationally important role of Newport's economy as identified in Future Wales?</p> <p>-How many jobs does Newport need and in what sectors (i.e. office; industrial; high tech; warehousing; etc) for the next 15 years? (particularly give the comments in Future Wales noting that highly skilled employment opportunities in the transport and digital communications sectors should be catalysts for further economic investments).</p> <p>-How much employment land do we need and where does it need to be provided?</p>	<p>- Support noted, in particular Economy and Employment; Health and Wellbeing; Natural Resources; Biodiversity; and Landscape Objectives.</p> <p>- References to the Environment (Wales) Act 2016; Future Wales; Planning Policy Wales are noted.</p>

-How do we support and encourage professional up-skilling and education of the Newport workforce? (particularly give the comments in Future Wales regarding the need to consider how the university can play a bigger role in supporting the regional economy, innovation and their communities).

-What are the impacts of Covid-19 / Brexit and how do we support the post pandemic economic recovery?

Health and Wellbeing - we support the identified issues, specifically the following:

-How should the plan support the provision and enhancement of green infrastructure networks? (particularly give the comments in Future Wales regarding how green infrastructure must both shape growth and be fully integrated as part of location and design solutions for proposed development. The Welsh Government support the need to maximise the use of GI and nature-based solutions as part of shaping urban growth).

Natural Resources - we support the identified issues, specifically the following:

-How can the plan ensure that the tranquillity of Newport's two areas of 'undisturbed' tranquil landscapes is preserved into the future? (particularly given the comments in PPW which note that the compatibility of land uses will be a key factor in maintaining tranquillity of areas and that access to such areas can help boost wellbeing.

Biodiversity - we support the identified issues, specifically the following:

-How can the plan ensure impacts on designated and important biodiversity sites, habitats and species are positive and result in net gains? (particularly given the comments in Future Wales which calls for policies in order to promote and safeguard the functions and opportunities such areas provide, the action required to provide a net benefit and for naturebased approaches to development).

-How can the plan protect and enhance ecological networks, including those that cross administrative boundaries? (all public authorities have a duty to enhance biodiversity and the resilience of ecosystems under section 6 of The Environment (Wales) Act 2016. The Welsh

<p>Government encourage cross working with adjoining authorities and other bodies to assist in meeting this duty (para 6.4.4 of PPW)).</p> <p>-The plan can explore opportunities to enhance existing and establish new green infrastructure corridors to improve connectivity, particularly within urban areas.</p> <p>-How can the plan promote the resilience of ecosystem as defined by the diversity, extent, connectivity, condition and adaptability of those ecosystem? (particularly given the advice in PPW on implementing the Section 6 Duty)</p> <p>Landscape - we support the identified issues, specifically the following:</p> <p>-How can the plan ensure that Newport's valued landscapes, townscapes, and seascapes are protected and enhanced? With a particular focus on the Gwent Levels. (particularly given what PPW says about the requirement for protection, management and the opportunities for tourism, recreation and wellbeing such areas afford.</p>	
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**00707/VIO/1/003 - Do you agree with the Objectives for the RLDP? If not, how and why do you think they should be changed?**

<b>Comment</b>	<b>Officer Response</b>
<p>We support the identified objectives for the RLDP, and particularly the following:</p> <p>Economy and Employment Provide for Newport's economic growth by offering a diverse range and choice of new and improved employment opportunities, which are adaptive to change and meet the needs of Newport and beyond, supporting a strong skilled and resilient workforce.</p> <p>Health and Well-being To improve health and well-being through the creation of well-connected, accessible, healthy and active places, tackling health and socioeconomic inequality through sustainable growth.</p> <p>Natural Resources Sustainably manage the natural resources in Newport to meet the needs of present and future communities, by ensuring resource efficiency, improved health outcomes, and the creation of a successful circular economy and green growth.</p> <p>Biodiversity and Geodiversity</p>	<p>- Support noted, in particular the Economy and Employment; Health and Well-being; Natural Resources; Biodiversity and Geodiversity; Landscape; and Climate Change objectives.</p>



<p>To maintain, enhance and improve the biodiversity and geodiversity of Newport and its surrounds, including improved resilience, diversity, connectivity and adaptability, whilst ensuring net benefits are facilitated from development.</p> <p>Landscape To protect and enhance the quality and character of Newport's landscape, townscape and seascape, and maximise the opportunities these features offer.</p> <p>Climate Change To ensure that development and land uses in Newport are resilient to the effects of climate change, and actively tackle the causes and impacts of climate change through minimisation, adaptation and mitigation.</p>	
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**St. Modwen Developments Limited - 00648**

**Date Acknowledged:** 24.03.2022

**Date Received:** 24.03.2022

**00648/VIO/2/001 - Do you agree with the Vision for the RLDP? If not, how and why do you think it should be changed?**

Comment	Officer Response
Please see letter (Savills, 24 March 2022).	N/A

**00648/VIO/2/002 - Do you agree with the issues identified? If not, how and why do you think they should be changed?**

Comment	Officer Response
Please see letter (Savills, 24 March 2022).	N/A

**00648/VIO/2/003 - Do you agree with the Objectives for the RLDP? If not, how and why do you think they should be changed?**

Comment	Officer Response
Please see letter (Savills, 24 March 2022).	N/A

**00648/VIO/2/004 - Any other comments**

Comment	Officer Response
Please see letter (Savills, 24 March 2022). ----	- Support noted.

Savills is instructed by St. Modwen Developments Limited ("SMDL") to make representations to the Newport Replacement Local Development Plan ("RLDP") Draft Vision, Issues and Objectives consultation. As you will be aware, SMDL is promoting the residential led mixed used regeneration of Glan Llyn which sits on the former Llanwern Steelworks site. This is one of the Newport's (and South Wales') key regeneration schemes and lies on a major gateway into South Wales. The site is previously developed (or brownfield) land and occupies a strategic and sustainable position. It is some 243 hectares in size and basically free from environmental designations and constraints. It has, however, been severely affected by its' industrial past. To date, SMDL together with an experienced project team have fostered excellent working relationships with key stakeholders and officers at Newport City Council ("NCC" or "the Council"). All parties recognise Glan Llyn as a clear local and regional priority for regeneration. Both SMDL and NCC also recognise that public sector assistance is needed to deliver the redevelopment of the site. Progress made to date demonstrates that a mixture of uses is possible and it is important that the site continues to feature as part of an allocated site in the RLDP. To ensure that it does, the site was promoted as a Candidate Site in August 2021. The submission reinforced the sites' potential for further redevelopment and recommended that Glan Llyn's allocation within the Eastern Expansion Area ("EEA") is maintained in the RLDP as a specific regeneration allocation. This letter has been prepared to provide some further explanation of Glan Llyn's credentials. It starts with the headlines of the current position and background, considers the current policy position before commenting on the draft vision, issues and objectives.

Glan Llyn - current position and background

The Glan Llyn scheme is a very significant regeneration project. The site (and the EEA that it forms part of) is one of the cornerstones of Newport's sustainable growth strategy.

- Candidate Site assessments are being carried out separately to this process, and the results of this assessment will be published at a later stage, any discussions necessary will be undertaken as part of that process.

- For clarity, the landscape objective encompasses all types of landscape areas (landscape, townscape and seascape) and not just those designated in the current plan. How this will affect development in detail will be determined as part of the policy drafting stage.

Outline planning permission ("OPP") was granted in April 2010 for the whole scheme (ref. 06/0471). The basic proposition is a new neighbourhood of approximately 4,000 new homes in a high quality (and transformed) environment, a local centre and a business park (now known as St. Modwen Park, formerly Celtic Business Park).

The site is rectangular in shape with longer sides of approximately 2km and shorter sides of 1km. Its western boundary is formed by Newport Retail Park District Centre, its northern boundary by the Tata and main railway lines and its eastern boundary by the retained Tata Llanwern Steelworks. Its long southern boundary is formed by the Queensway (A4810).

Development of the main new residential neighbourhoods falls into two main sub areas. The masterplan for the western area was approved in November 2010 and for the eastern area in February 2020. Applications (for the approval of reserved matters) have since been made and approved for a number of homes together with infrastructure that will serve them which is now in place. In addition, upgrades to the Queensway road to the south of the site has provided a major new link road.

The scheme is expected to take about 20 years to complete, by which time it will have created or supported 6,000 jobs. Many of these will have come from the development of the new housing on the site. The project requires long term vision and long term commitment. SMDL has provided both. It is one of the UK's leading regeneration companies, acts as master developer and is responsible for installing the new hard and soft infrastructure and landscaping. SMDL has established a Management Company to maintain the new development and will develop most of the business park itself. Individual house builders, housing associations and other bodies will be responsible for the delivery of new homes across multiple phases. A new neighbourhood will transform this previously developed site and will include substantial new areas of open space and parkland, two new primary schools and a local centre. SMDL is committed to the ongoing redevelopment of Glan Llyn development and the adjacent employment site. Reference is made to each

of the sites under policies H1 and EM1 and EM2 of the current adopted Local Development Plan (January 2015) ("LDP"). These policies capture the potential of the site to create a new residential led mixed use urban extension. The successful delivery at Glan Llyn to date has been achieved in very difficult market conditions - especially at the beginning of the development process for a very large scheme. Very few other sites have made anything like the progress that Glan Llyn has in these conditions.

It is therefore entirely reasonable for NCC to allocate the site for redevelopment in the RLDP (2021-2036) and to expect rates of development to increase as economic conditions improve and further key milestones are made with the scheme. These will include the next phases of residential development, the construction and opening of the second primary school, the development of the central and eastern lakes, and construction and operation of the next phases of business units at St. Modwen Park.

Regeneration of the site will also see one of Wales' largest previously developed sites recycled and transformed. This qualitative dimension of the scheme is just as important as the quantity of new housing and employment space that will be developed there.

#### Western and Eastern Sub Areas

The OPP for the site is based on a masterplan that shows how the development will be organised. The permission requires the agreement of a series of sub area masterplans.

The Western Sub Area extends to about 60 hectares and comprises the first 1,250 new homes split into five main development areas. As its name suggests, it includes the western part of the site next to the Newport Retail Park District Centre (Spytty) and close to where the Queensway turns into Queensway Meadows before it meets the A48.

The majority of the Western Sub Area has been delivered including: tackling the ground conditions, structures and services from its industrial past; provision of new roads (including the site's gateway); the development of a number of homes (by various housebuilders) have been

completed, or are underway, approved or in the planning pipeline; the first of the two primary schools for the development; the majority of Glan Llyn's green and blue grid of open space have been provided, including a large play and sports space, known as Western Park.

The Eastern Sub Area includes the remainder of the site up to its eastern boundary along to St. Modwen Park. It includes a number of phases for homes, together with the rest of the site's infrastructure and landscaping elements, including the central and eastern lakes, and the Avenue Road which connects to the Queensway to the south, and Main Street to the south which connects to the Local Centre. The approval of the Eastern Sub Area masterplan unlocked the remainder of the site and has subsequently seen reserved matters approvals come forward for residential phases and other open space and infrastructure.

#### Local Centre

A separate sub area masterplan has been approved for the local centre which includes a range of retail, leisure, residential and community facilities to serve the wider Glan Llyn community. The local centre is accessed directly from a signal controlled junction on the Queensway.

The infrastructure has been installed and the Marston's Llanwern Bull Pub and Restaurant is now open. Progress is ongoing on the delivery of other aspects to the local centre.

#### St. Modwen Park (formerly Celtic Business Park)

At the eastern end of the site, work on St Modwen Park is underway. This area also required its own sub area masterplan which was approved in 2015. The main road access has been approved and installed and the first four phases for business units have been approved, with some built and occupied and others expected to be constructed shortly. A Reserved Matters application for Phase 4 was approved in July 2021 and will deliver a further four business units (Units 4-7). Further planning applications are expected to follow.

#### Planning policy

#### Local Development Plan

The Glan Llyn concept responded to the closure of the former Llanwern Steelworks site. In its Unitary Development Plan ("UDP"), the Council allocated the former 'heavy end' of the steelworks and other land in the vicinity as the Eastern Expansion Area ("EEA"). This allocation continues in the adopted LDP. The strategy of the LDP recognises that the EEA is integral to the city's growth strategy, and is underpinned by the allocation and delivery of the Glan Llyn regeneration site. Strategic Policy SP11 relates solely to The Eastern Sub Area and states that:

'The Eastern Expansion Area consists of the former Llanwern Steelworks regeneration site known as Glan Llyn H1(47) and EM1(vii), and housing sites at Llanwern Village H1(3), Hartridge High School H1(19) and Jigsaw Site H1(55). This Eastern Expansion Area is identified as a residential led mixed use, sustainable urban expansion area which will provide a range and choice of housing, employment land and community uses.'

As well as supporting wider growth and regeneration ambitions, Glan Llyn helps NCC deliver its housing requirements in a sustainable way. The site provides 25% of the LDPs overall requirement to 2026 (and the EEA contributes just under 40%). Glan Llyn will also contribute to longer term housing requirements beyond the current plan period.

Future Wales - The National Plan 2040 (February 2021)  
Policy 33 (National Growth Area - Cardiff, Newport and the Valleys) recognises Newport as part of a wider National Growth Area across the south east. The policy notes:

"Cardiff, Newport and the Valleys will be the main focus for growth and investment in the South East region. Strategic and Local Development Plans should recognise the National Growth Area as the focus for strategic economic and housing growth; essential services and facilities; advanced manufacturing; transport and digital infrastructure."

The policy continues:

"The Welsh Government supports an increased strategic role for Newport as a focus for sustainable, long term growth and investment. The

Welsh Government will work with authorities within the region and in England to promote Newport's strategic role and ensure key investment decisions in Wales and England support Newport."

It is therefore clear that, at a national level, the strategic and sustainable development of regeneration schemes such as Glan Llyn should have full support.

Comments on Draft Vision, Issues and Objectives

As a high level document, the RLDP's Draft Vision, Issues and Objectives sets out 10 key themes which will be the focus for the evidence base and policy development of the City's new Plan The key themes are informed by the current situation and key issues for the RLDP to address.

SMDL finds much to support within the document and provides further commentary on each of the 10 draft objectives below.

-Economy and Employment. This objective is to provide for Newport's economic growth through new and improved employment opportunities which adapt to change and support a strong and resilient workforce.

SMDL supports this objective. The Glan Llyn regeneration project delivers both direct and indirect economic and employment benefits, during construction and occupation of the homes and spaces created. The delivery of much needed housing in Newport also provides indirect economic dividend by increasing the prospects of people living, working and spending in the local area. Significant employment opportunities are also to be realised through the delivery of industrial and warehousing units at St. Modwen Park.

-Population and Communities. This objective focuses on the provision of high-quality homes which are also supported by social, environmental, cultural and physical infrastructure to provide safe and healthy places.. The document notes that the current LDP has ensured the protection and delivery of community facilities, including a new primary school at Glan Llyn.

SMDL supports this objective too. Glan Llyn delivers infrastructure to serve the development in the form of new schools, local centre and

open space appropriate to meet the new neighbourhoods needs and requirements. These facilities are important in the successful delivery of communities and place-making.

-Health and Well-being. This objective seeks to improve health and well-being through creating well-connected, accessible, healthy and active places, tackling health and socio-economic inequality through sustainable growth. SMDL support this objective. The masterplan approach to the delivery of development across Glan Llyn builds in the health and well-being of existing and future residents and visitors. For example, the masterplans seek the delivery of extensive areas of green and open space, for example Western Park and the various greenways throughout the site.

-Equality, Diversity and Inclusion. Seeks to create quality positive places in which development assists with creating inclusive, connected, adaptable and accessible communities that are cohesive and where Newport's culture, including the Welsh language is valued and promoted.

SMDL supports this objective and the delivery of Glan Llyn will foster inclusive and accessible communities that promote culture and diversity. Glan Llyn has, and will continue to, deliver a significant contribution to affordable housing

Transport and Movement. Aims to reduce the need to travel and increase the use and provision of sustainable travel options.

SMDL support this objective. Glan Llyn is a sustainably located urban extension, providing housing and employment floorspace in accessible locations. It encourages and enable active travel - on example is the infrastructure provided in the form of shared pedestrian cycleways across the development.

-Natural Resources. Focuses on meeting the needs of present and future communities through sustainably managing natural resources achieved by resource efficiency, improved health outcomes and creation of a successful circular economy and green growth.

SMDL support this objective. The site is heavily contaminated as a result of its industrial past, however, the regeneration of the site is



providing the opportunity to treat and remediate much of the site. By doing so, and utilising previously developed land, this helps improve environmental conditions. Recycling the site also reduces pressure on greenfield sites (and should be prioritised).

-Biodiversity and Geodiversity. This objective is to maintain, enhance and improve the biodiversity and geodiversity of Newport and its surrounds, including improved resilience, diversity, connectivity and adaptability, while also ensuring net benefits are facilitated from development.

SMDL support this objective. As noted above, the site is heavily contaminated as a result of its industrial past. The site offered little by way of biodiversity and ecology during its operations as a steelwork site, however, through careful regeneration and a masterplan that looks to deliver significant green and blue infrastructure, Glan Llyn will be delivering considerable biodiversity improvements.

-Historic Environment. Seeks to preserve, enhance and realise the value of Newport's heritage resources, through investment, interpretation and maximisation of opportunities provided by the historic environment and archaeological assets.

Glan Llyn is free from historic environment constraints. SMDL therefore has no direct comments to make on this matter.

-Landscape. Focuses on the protection and enhancement of the quality and character of the landscape, townscape and seascape and maximise the opportunities from these features.

Glan Llyn is free from any landscape designations or constraints. SMDL therefore has limited direct comments to make but support the objective of improving townscape and is seeking to achieve this at Glan Llyn through a careful masterplanning approach. The regeneration of the site is also a significant visual improvement on what was there previously.

-Climate Change. Aims to ensure development and land uses are resilient to the effects of climate change and actively tackle the cause and impacts of such through minimisation, adaption and mitigation.

SMDL support this objective. As noted above, Glan Llyn is considered a sustainably located urban extension, providing housing and employment floorspace in accessible locations. The regeneration and recycling of the site will also see one of Wales' largest previously developed sites transformed, delivering much needed housing in a sustainable location and in doing so also reduces pressures for housing delivery on greenfield sites. The masterplan-led approach seeks to encourage and enable active travel, for example the infrastructure provided in the form of shared pedestrian cycleways across the development.

#### Conclusion

As stated at the beginning of this letter, SMDL seeks to reiterate Glan Llyn's importance as a key regeneration site to deliver the objectives of the RLDP. This reflects the planning position and delivery on site to date and the clear potential of the scheme to continue to provide a residential-led mixed use urban extension on a previously developed site within the plan period of 2021-2036 of the RLDP. In this context, SMDL finds much to support across the objectives.

The scheme is a major sustainable regeneration initiative and is a true commitment: OPP has been granted, the site is in the hands of an active and experienced development company, significant and substantial infrastructure has been installed and development is underway by multiple housebuilders. Glan Llyn continues to both warrant and need clear planning support and should be identified as a clear priority and objective for the RLDP.

I trust the above is clear and I look forward to receiving confirmation of the registration of our representations in due course. If you require any further information please do contact me.

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**The Church Commissioners For England - 00639**

**Date Acknowledged:** 24.03.2022

**Date Received:** 24.03.2022

**00639/VIO/2/001 - Do you agree with the Vision for the RLDP? If not, how and why do you think it should be changed?**

Comment	Officer Response
<p>On behalf of our client, the Church Commissioners for England (CCE), we enclose representation to the Newport Replacement Local Development Plan (RLDP) Draft Vision, Issues and Objectives document, issued for public consultation until 25 March 2022.</p> <p>CCE is a registered charity that supports the work and mission of the Church of England across the country. Their investment policy is to hold a diverse portfolio of investments across a broad range of asset classes consistent with their ethical guidelines.</p> <p>CCE own land in Newport, to the north of the village of Caerleon, extending to circa 130 hectares. The site was put forward in the Call for Candidate Sites in August 2021, and a copy of the submission is appended for reference. CCE supports in principle the draft vision in the consultation document and welcomes the opportunity to work with the Council to achieve its ambition through the delivery of homes and infrastructure to create safe and sustainable places. CCE's land at Caerleon has the potential to deliver a new garden village to realise the Council's ambition by contributing to national growth in Wales; tackle inequality through sustainable patterns of development; and can suitably manage natural resources to contribute to a resilient city.</p>	<p>Support noted.</p> <p>Candidate Site assessments are occurring separately from this process. The outcome of those assessments will be published at a later stage in the process.</p>

**00639/VIO/2/002 - Do you agree with the issues identified? If not, how and why do you think they should be changed?**

Comment	Officer Response
<p>CCE generally supports the identified key issues to be addressed for each objective within the consultation document. We comment in relation to specific issues and objectives below.</p> <p>In relation to the key issues for population and communities, in considering the most suitable locations for urban expansion the Council should consider allocating land for garden villages as part of its strategy. CCE's land at Caerleon is a suitable, viable and deliverable site that could come forward and we expand on the benefits of this further in our comments on the objectives.</p>	<p>Support noted.</p> <p>Candidate Site assessments are occurring separately from this process. The outcome of those assessments will be published at a later stage in the process.</p> <p>Comments regarding air quality are noted. It is considered that this issue is already reflected under both the Health and Well-being Objective and the Transport and Movement Objective.</p>

In considering the key issues for transport and movement, air quality should be a fundamental consideration. It is noted that the health and wellbeing issues identified include how the plan can negate the impact on development on air quality. However, it is considered that the plan should go further, and the Council should also consider how strategic transport solutions can contribute to addressing air quality issues prevalent within the area.

It is understood that air quality in Caerleon is a particular issue due to traffic congestion along the one-way system and narrow streets. As such, Caerleon is particularly suited to any improvements which would help improve air quality in the area, such as a strategic relief road.

CCE's site brings the opportunity to deliver a relief road between Caerleon and the A4042, limiting the amount of traffic which would need to go through the village on a day to day basis. Therefore, it is likely that this development could assist in improving air quality within the wider village.

Air quality in Caerleon would be further improved by the opening of a new train station, a key aspiration of the Welsh Government which could be supported by the development of CCE's site. The size and positioning of the proposed development allocation would increase the demand for local rail services and help in supporting long-term viability of the service. The proposal site could also generate the case for increasing the frequency of current rail services on the route between Cwmbran and Newport Stations (the Welsh Marches Line), supporting the RLDP objective of increasing the use and provision of sustainable travel options.

Such strategic solutions should specifically be incorporated as key issues for consideration and to be addressed as part of the RLDP preparation, as well as forming objectives.

In relation to the key issues for landscape, specifically whether current urban boundaries should be extended or tightened, the Council should carefully consider how boundaries are drawn to ensure there is sufficient space to plan for the development necessary to meet

Noted. The appraisal of urban and village boundaries and Green Wedge designations will be carried out as the plan progresses.

<p>identified needs. Similarly, current Green Wedge designations should be reviewed to ensure sustainable development can come forward over the next plan period.</p>	
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**00639/VIO/2/003 - Do you agree with the Objectives for the RLDP? If not, how and why do you think they should be changed?**

<b>Comment</b>	<b>Officer Response</b>
<p>CCE supports the objectives identified for the RLDP and considers these to be appropriate to meet the vision and ambition for the plan.</p> <p>In particular, it strongly supports the population and communities objective to deliver high quality homes supported by necessary social, environmental, cultural and physical infrastructure. As part of its strategy to meet this objective, the Council should consider options for a strategic garden village. CCE's land at Caerleon extends to circa 130 hectares and provides an opportunity to deliver a new sustainable garden village development of up to 2,000 new dwellings alongside a local centre, employment land and social and community infrastructure.</p> <p>Allocation of the site for a garden village could make a substantial contribution to meeting this objective as well as the other objectives identified within the consultation document. The development would be designed to be sustainable, with local residents able to meet the majority of their day to day needs on site.</p> <p>Whilst the development is of a scale to be considered a standalone community, it will also be within walking distance of Caerleon village and cycling distance of Newport city centre, making it a sustainable development opportunity. The western boundary of the site is located less than 1km from the built-up area of Newport City via an existing direct cycle route, and the eastern most parts of the site would only be a 1.3km walk into Caerleon village. As such, the site provides opportunities for a modal shift towards active travel and a reduction on the reliance on cars. The site also has excellent links to Malpas and Ponthir.</p> <p>The site is subject to several environmental designations, including Lodge Wood which is part of a Site of Importance for Nature</p>	<p>- Support noted, in particular the Population and Communities Objective.</p> <p>- Candidate Site assessments are occurring separately from this process. The outcome of those assessments will be published at a later stage in the process.</p> <p>- Comments regarding air quality are noted.</p> <p>The Vision and Objectives are overarching elements of the plan that apply to all areas.</p> <p>The Transport and Movement Objective as currently drafted is considered appropriate, as more areas specific details would undermine its overarching function.</p>

<p>Conservation (SINC). This natural resource can be sustainably managed as part of development plans in line with the natural resources objective, by excluding it from the development area and enhancing it as an area for nature conservation and recreation. Further opportunities for green infrastructure, open space, leisure and recreation provision would be provided through the strategic garden village development itself.</p> <p>With respect to the transport and movement objective, in line with our earlier comments on air quality, the objective should be bolstered to consider strategic highways and rail solutions to address the air quality issues within the area. This should include consideration of a relief road between Caerleon and the A402 which CCE's land could facilitate as part of a wider strategic development allocation.</p>	
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**00639/VIO/2/004 - Any other comments**

<b>Comment</b>	<b>Officer Response</b>
<p>CCE's site represents an opportunity to provide a garden village to the north of Caerleon. The provision of housing (a proportion of which will be affordable), the creation of ancillary employment generating uses, and the green infrastructure that will be included on site represent significant environmental, social, cultural and economic advantages. The proposals would be well contained due to the existing topography and the natural site boundaries. The site is within a sustainable location with good opportunities for walking and cycling in the local area as well as diverting/extending existing public transport services into the site.</p> <p>We trust that the above comments will be taken into account by the Council during the preparation of the emerging Local Plan. Should you have any questions, or require additional information, please do not hesitate to contact me or my colleague, Pauline Roberts.</p>	<p>- Candidate Site assessments are occurring separately and any discussions necessary will be undertaken as part of that process.</p>

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**H E Murray - 00637**

**Date Acknowledged:** 24.03.2022

Date Received: 23.03.2022

**00637/VIO/2/001 - Do you agree with the Vision for the RLDP? If not, how and why do you think it should be changed?**

<b>Comment</b>	<b>Officer Response</b>
<p>In general terms we agree with the RLDP vision. In new housing development such as the recently submitted candidate site (Ref: CS-0025 - Land at The Griffin), we place significant emphasis on creating new, sustainable neighbourhoods that deliver a mix of new homes to suit a range of needs, new high quality green spaces for people to enjoy and new pedestrian and cycle links which integrate with the surrounding active travel network. It is important for the RLDP to work alongside national policy documents such as Future Wales and Planning Policy Wales to ensure good design and placemaking principles are adhered to, to create accessible, sustainable, high-quality places where people want to live. Any new development should seek to benefit the wider local community through the provision of new and improvement of existing active travel to promote health and wellbeing and job creation, where possible. Outside of the commitment to deliver better places within Newport, we recognise the importance of the local economy, maximising historical and cultural assets and the protection of the existing natural environment. These are well signposted in the 'vision' and expanded on in the subsequent issues and objectives. The vision successfully captures the key challenges and opportunities that currently exist and look likely to evolve into the next plan period.</p>	<p>- Support noted. - Candidate Site assessments are being carried out as part of a separate process. The results of this assessment will be published at a later stage.</p>

**00637/VIO/2/002 - Do you agree with the issues identified? If not, how and why do you think they should be changed?**

<b>Comment</b>	<b>Officer Response</b>
<p>The projected significant increase in housing need in Wales and, particularly Newport is a critical issue that has been sufficiently identified. Latest household estimate figures for Wales highlight the ongoing trend over the last 30 years for an increase in households, mainly due to increases in one-person and two-person households, which remained the most common household types in Wales, based on these</p>	<p>- Support noted. - The mix of housing types and tenure will be considered in further detail as the plan progresses. - Candidate Site assessments are being carried out as part of a separate process. The results of this assessment will be published at a later stage.</p>

<p>estimates. A greater emphasis should be placed on housing type and tenure when addressing housing growth. Recognising that this ongoing trend for the increase in the formation of one and two person households is likely to continue through the plan period, points to a clear need for the provision of additional smaller homes in the City to accommodate for this growth and cater for smaller households. New sites need to consider the provision of a range and mix of homes to assist in addressing the demographic and affordability challenges facing Newport, as demonstrated at Site CS-0025 - Land at The Griffin. The issue of climate change is at the forefront of all new development in Wales and its regions. It is important that we continue to make positive contribution toward addressing the causes of, and adapting to the impacts of, climate change. This can be achieved through reducing energy demand and promoting energy efficiency; developing a sustainable water strategy; aiming to use sustainable materials and minimise resource use, where possible; and the incorporation of green infrastructure, reduction of solar gain, passive ventilation, flood risk management, and sustainable drainage systems.</p>	
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**00637/VIO/2/003 - Do you agree with the Objectives for the RLDP? If not, how and why do you think they should be changed?**

<b>Comment</b>	<b>Officer Response</b>
<p>The objectives should perfectly align with the key issues facing Newport during the plan period. The starting point is growth. This agenda will be achieved by making existing places better for now and the future. Compromise is inevitable. The opportunity to improve existing places exists but will require greenfield land. Accepting this necessity enables the most otherwise sustainable outcome to be achieved. In doing so, the overall growth objective is not compromised. Development at greenfield sites located at West Newport can utilise the sustainable transport modes available including the rail services to Cardiff and Newport from Rogerstone and Pye Corner. The site at the Griffin (CS-0025) offers the opportunity to provide housing within walking distance of existing communities where access to facilities can be made on</p>	<ul style="list-style-type: none"> <li>- The need to facilitate sustainable growth is noted and recognised within the current drafting of the Vision, Issues and Objectives. This will be explored in further detail as part of the Growth and Spatial Options stage to follow.</li> <li>- Candidate Site assessments are being carried out as part of a separate process. The results of this assessment will be published at a later stage.</li> </ul>



foot / by people with reduced mobility. There are not that many locations where you can access as many facilities as easily as you can from the Griffin.	
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**00637/VIO/2/004 - Any other comments**

<b>Comment</b>	<b>Officer Response</b>
Whilst listed in the anticipated evidence base, viability and deliverability is key to the implementation of any new development. Sufficient assessment and appraisal work should be undertaken to identify significant constraints early in the process, that would have a negative effect on potential viability.	Noted.

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**Persimmon Homes Welsh Government - 00641**

**Date Acknowledged:** 24.03.2022

**Date Received:** 23.03.2022

**00641/VIO/2/001 - Do you agree with the Vision for the RLDP? If not, how and why do you think it should be changed?**

<b>Comment</b>	<b>Officer Response</b>
<p>We agree with the stated vision for Newport which reflects the position of the city within the National Growth Area and as a focus for strategic economic and housing growth (as identified in Future Wales - The National Plan 2040). It also reflects the reference to Newport in Future Wales as having "an increased strategic role as a focus for sustainable, long-term growth and investment." By defining Newport as "a strategically significant City which will contribute towards the national growth of Wales" the Vision reflects the following commitments in Future Wales:</p> <p>1 "The Welsh Government will work with authorities within the region and in England to promote Newport's strategic role and ensure key investment decisions in Wales and England support Newport." (page 164)</p> <p>2 "The Welsh Government is determined to see development and growth in Newport, allowing the city to fulfil its potential as a second focal point for the region." (page 165)</p>	<p>- Support noted.</p> <p>- Details on the most appropriate places to accommodate sustainable growth will be explored as part of the Growth and Spatial Options stage to come.</p> <p>- We note the importance of the placemaking objectives/outcomes within Future Wales and Planning Policy Wales, and in our view this has been appropriately reflected in the current drafting of the Vision, Issues and Objectives.</p> <p>- Candidate Site assessments are being carried out as part of a separate process. The results of this assessment will be published at a later stage.</p>

3 "Growth at Newport will help manage the development pressures in the region by providing a strategic growth focus for the eastern part of the area." (page 167)

4 "Strategic growth should be focused in and immediately adjoining Newport itself, to support brownfield regeneration." (page 167)

Newport is rapidly expanding. The Welsh Government's 2018-based Household Projections identify a 9% increase in the number of households in Newport between 2021 and 2036. This is the highest rate of increase of all local authorities in Wales; it is more than double the average of 4.25% in South East Wales and three times the increase of 3.1% in Wales over the same period. Newport also has the capacity to continue its rapid employment growth - serving as a driver of the Welsh economy and assisting in its recovery from the Covid-19 pandemic. It will be important to support this through the identification of suitable sites for housing and employment purposes.

We further agree that sustainability should be at the heart of the vision for Newport and that this aspiration should inform future patterns of development, the management of natural resources and mobility strategies for individual development schemes and the city as a whole.

Given the significant constraints that exist in Newport, this raises particular challenges when set alongside the ambition for growth. It is important to direct future development to locations that are not subject to specific landscape or ecological sensitivities or at risk of flooding.

This results in very limited options for growth - predominantly to the east in locations that benefit from good accessibility via active travel routes and public transport options.

A move towards carbon neutral and zero carbon development is a key Welsh Government objective and is appropriately supported in the draft RLDP vision. Whilst we are supportive of this ambition, it is important to have regard to the deliverability implications of this - balancing the need to address the challenge of climate change against the need for development. Given the importance that is placed on placemaking objectives within Future Wales and Planning Policy Wales, we would recommend that

<p>consideration should also be given to these within the vision, issues and objectives of the LDP  The proposed development at land north of Llanwern is fully compliant with this vision. It has the capacity to make a significant contribution to growth in Newport, and contribute to its role in Wales, by concentrating development on one of the only sites in the local authority area that is free from significant constraints (including flood risk and existing/proposed green belt/Best and Most Versatile agricultural land) and which can benefit from high quality sustainable transport options. The delivery of zero carbon mixed-use development in this location by Persimmon Homes and Welsh Government will also reflect the key sustainability and placemaking aspirations.</p>	
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**00641/VIO/2/002 - Do you agree with the issues identified? If not, how and why do you think they should be changed?**

<b>Comment</b>	<b>Officer Response</b>
<p>We agree with key issues identified in the Vision, Issues and Objectives document in the sections entitled What is the current situation? and Key issues for the Plan to address and comment on these matters in more detail below.  Housing and the economy  The identification of Newport as a focus for development within the National Growth Area in Future Wales has significant implications for the LDP which must help to drive economic growth through the provision of sufficient land for economic development and housing. In this regard, consideration of the future direction of the economy should be very carefully tested through evidence so as to understand both the level of job growth and the type of sectors that will experience the most rapid growth over the LDP period. However, recognising that some sectors might also decline locally, the LDP should adopt a flexible approach to dealing with sites that may no longer be suitable for continued employment purposes.  As preparation of the Newport LDP Review moves forward, the quantum of growth and the distribution of employment sites will both be critical, particularly given the physical constraints from which Newport suffers. In considering this matter, we would recommend that regard</p>	<ul style="list-style-type: none"> <li>- Support noted.</li> <li>- Specific details on the levels of growth required, including changing patterns of work, will be explored as part of the Growth and Spatial Options stage.</li> <li>- The evidence base will be developed in line with the Development Plan Manual requirements.</li> <li>- The importance of any new development being sustainably located to address health, equality and transport matters is noted. These will continue to be considered in detail as part of the Growth and Spatial Options stage to follow.</li> <li>- The challenges for the plan to address climate change and enhancing the environment are noted, and will continue to be an ongoing consideration as the plan progresses.</li> </ul>

should be given to the increased demand for people to work locally or from home as this will have implications on the mix of housing to be provided (i.e. generating a demand for larger properties with dedicated space to be used as home offices) and the provision of work-hubs within district and local centres.

The role of Newport as a centre for growth in South East Wales and part of a national growth area similarly sets the context for the LDP in respect of population and housing growth. It is recognised that growth in Newport has been, and continues to be, significantly above the average for South East Wales and Wales as a whole. Housing delivery over the current LDP period has been relatively strong but we agree that this has not been able to address the problems of increasing house prices and deteriorating affordability. This underlines the importance of ensuring an adequate supply of housing in the future. Whilst the Welsh Government's household projections should form the starting point for the assessment of future housing need, these should not be the only source that is taken into account. Instead, regard should be given to the range of considerations that are set out in the Development Plans Manual including alignment with economic growth, demographic trends and affordable housing need. We would be very concerned were the housing requirement contained within the LDP to be limited to the level of household growth set out in the Welsh Government projections. Such an approach would fail to reflect the true need that exists in Newport and would not reflect its growth status.

We agree with the consultation document's statement that Newport combines the most wealthy and most deprived neighbourhoods in Wales.

It will be important for the LDP to address this through regeneration initiatives and the provision of a sufficient quantum of new housing (including affordable housing) and associated community facilities. In addition to focusing on the overall need for housing, it will also be important to ensure that an adequate range and mix of housing types is provided in order to meet the needs of all communities and

households that wish to live in Newport. This should not solely focus on the delivery of smaller homes but a balanced provision must also be made for family homes and specialist accommodation for older people and those with particular needs.

We note that a large proportion of recent housing delivery in Newport has been on brownfield sites and agree that the limited supply of such sites going forward will necessitate the release of greenfield land. The LDP should recognise this in its allocation of development sites and, whilst continuing to support the redevelopment of brownfield land, it must identify an adequate quantum of greenfield sites to meet the identified housing needs. This should include sites for urban expansion which will offer a means by which a range of land uses can be delivered so as to maximise sustainability. Any review of opportunities for such strategic sites should reflect the significant constraints that affect Newport - not least the large proportion of the authority that is at risk of flooding - and ensure that future development can be resistant to - and help to address - the effects climate change.

#### Health and equality

We agree that health and wellbeing represent key objectives of the Wellbeing of Future Generations Act and that the Covid-19 pandemic has highlighted the importance of this. A key implication for the LDP will be to ensure that new developments are planned around open space and Green Infrastructure and that a sustainable mix of uses can reduce the need to travel, with sustainable transport options (including active travel) available. This again highlights the importance of sustainable urban extensions which are very well placed to contribute towards these aims alongside smaller-scale development sites within the existing urban area.

#### Transport

The sustainable transport hierarchy that is set out in Planning Policy Wales represents an important starting point for any consideration of transport and mobility issues in the LDP. The draft Vision, Issues and Objectives document recognises that, going forward, new

developments should be framed around the use of active travel, public transport, the internalisation of travel, off-site mitigation (where required) and the promotion of ultra low emission vehicles. Such an approach will be important in helping to address existing issues of congestion, poor air quality and carbon emissions. Given the limited ongoing supply of brownfield land within the existing urban area, there may be challenges in continuing the exiting "centrefirst" approach to development. However, the development of greenfield sites - and particularly urban extensions - provide the opportunity for a step change in the approach to mobility by offering the potential to build the new community around the principles of accessibility and sustainable movement. This would include the integration of different land uses and the provision of high quality virtual connectivity in order to reduce the need to travel; the provision of convenient, safe and attractive active travel routes; and the integration of existing neighbourhoods to new facilities and services so as to help reduce the need for existing residents to travel.

#### Climate change and the environment

The need for new development in Newport must be considered in the context of the environmental constraints of the city and the overarching importance of tackling the impacts of climate change. The Welsh Government and Newport Council have declared a climate emergency and it is important that the revised LDP provides a basis by which to help address this. However, seeking to resist growth would not be a sustainable solution and would not serve the best interests of Newport or its existing and future population. Instead, it is important to ensure that an appropriate level of new development is provided for in appropriate locations, having regard to the environmental capacity of the area. This will include:

- 1 Ensuring that new development avoids areas that have been identified as being at risk of flooding - this will be a particular challenge in Newport given the extent of flood zones 2 and 3;

<p>2 Ensuring that new development incorporates an appropriate quantum and type of blue and green infrastructure and contributes to biodiversity net gain whilst improving ecological connectivity, avoiding, minimising and mitigating harm;</p> <p>3 Avoiding the areas of best and most versatile agricultural land, so far as possible;</p> <p>4 Avoiding designated sites - including the existing and proposed Green Belt - so far as possible;</p> <p>5 Ensuring that the landscape impact of new development is minimised so far as possible and that it can be sensitively integrated through a careful approach to location, design and mitigation; and,</p> <p>6 Requiring new development to meet high standards of energy efficiency and decarbonisation through their location, layout, approach to mobility, and building design.</p> <p>The key issues that are identified in respect of environmental and climate change issues are very significant and will require careful consideration. However, we believe that it will be possible for the LDP to deliver the quantum of development that is required in Newport in a manner that will support and enhance the environment and those characteristics that make it such a special place.</p>	
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**00641/VIO/2/003 - Do you agree with the Objectives for the RLDP? If not, how and why do you think they should be changed?**

<b>Comment</b>	<b>Officer Response</b>
<p>We agree with the objectives relating to the importance of providing for economic growth and a sufficient number of high quality homes, and that regard should be had to the status of Newport as the second focal point in the national growth area behind Cardiff in respect of both of these matters. Going forward the quantum and location of land for employment and residential development will be key considerations and it will be essential to ensure that the sites that are identified for development are deliverable in the context of the significant constraints that exist across Newport.</p> <p>We likewise agree that it is important to ensure that new homes are supported by the full range of necessary infrastructure that will maintain</p>	<p>- Support noted.</p> <p>- Details on the most appropriate places to accommodate sustainable growth will be explored as part of the Growth and Spatial Options stage to come.</p> <p>- Candidate Site assessments are being carried out as part of a separate process. The results of this assessment will be published at a later stage.</p>

and enhance the local community and wider settlement. The opportunity exists through new development to enhance the sustainability of Newport and deliver a range of facilities and services that will benefit existing and future residents. The delivery of mixed-use strategic sites will play a particularly important role in this regard. Such sites will also be important in promoting the health and well-being of existing and future communities and delivering inclusive communities that support the needs of all, including those in need of affordable housing and specialist accommodation.

The objective to reduce the need to travel and increase the use and provision of sustainable travel options is logical and appropriate. This can be achieved through the delivery of sustainable urban extensions which provide a mix of land uses and integrate high quality and innovative public transport solutions from day one. However, a complete modal shift away from the private car will take a considerable time to be achieved and so the LDP should plan for and support ultra low emission vehicles through the provision of adequate charging infrastructure as part of new developments.

The objectives relating to the environment and climate change are appropriate and provide the basis by which the need for development can be accommodated in a manner that protects and enhances the environment and tackles the causes and impacts of climate change.

However, it is of critical importance that any allocations and policies within the LDP support the deliverability of development. In the face of competing pressures for the provision of affordable housing, community facilities, green infrastructure/public open space, mobility solutions and carbon neutral development, Newport Council must think very carefully about its priorities in order to ensure that its policy aspirations do not render development unviable and consequently result in the LDP becoming undeliverable.

**00641/VIO/2/004 - Any other comments**

Comment	Officer Response
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<p>The proposed development of a residential-led strategic mixed use development north of Llanwern accords with the vision, issues and objectives of the LDP. In summary, it:</p> <p>1 Represents the right location for growth:</p> <p>a Benefitting from a strategic location that is well related to Newport;</p> <p>b Being largely free from the risk of flooding, not designated or proposed for designation as a Green Belt, not sensitive from a landscape and ecological perspective, and not designated as best and most versatile agricultural land; and,</p> <p>c Having limited heritage assets, and the ability to integrate these into the development. This freedom from constraints sets it apart from the majority of sites in Newport.</p> <p>2 Has the capacity to accommodate housing and employment growth together with a range of community facilities, all set within a very high quality environment.</p> <p>3 Is able to integrate with sustainable transport options and benefit from an extensive active travel network;</p> <p>4 Offers considerable opportunities for biodiversity net gain;</p> <p>5 Will provide zero carbon ready buildings;</p> <p>6 Will respond to economic imbalances and deprivation issues, both locally and at a local authority level.</p> <p>We consider this to represent one of the best opportunities for development in Newport at this time and look forward to working with officers in respect of this opportunity as the LDP process progresses.</p>	<p>- Candidate Site assessments are being carried out as part of a separate process. Any information or discussions required will be carried out as part of that process. The results of this assessment will be published at a later stage.</p>
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**Newport Golf Club - 00193**

**Date Acknowledged:** 24.03.2022

**Date Received:** 23.03.2022

**00193/VIO/2/001 - Do you agree with the Vision for the RLDP? If not, how and why do you think it should be changed?**

<b>Comment</b>	<b>Officer Response</b>
<p>In general terms we agree with the RLDP vision. In new housing development such as the recently submitted candidate sites at Newport</p>	<p>- Support noted.</p>

<p>Golf Club (Wood Close (NGC(1)) and (Pontymason Lane (NGC(2))), we place significant emphasis on creating new, sustainable neighbourhoods that deliver a mix of new homes to suit a range of needs, new high quality green spaces for people to enjoy and new pedestrian and cycle links which integrate with the surrounding active travel network. It is important for the RLDP to work alongside national policy documents such as Future Wales and Planning Policy Wales to ensure good design and placemaking principles are adhered to, to create accessible, sustainable, high-quality places where people want to live. Any new development should seek to benefit the wider local community through the provision of new and improvement of existing active travel to promote health and wellbeing and job creation, where possible. Outside of the commitment to deliver better places within Newport, we recognise the importance of the local economy, maximising historical and cultural assets and the protection of the existing natural environment. These are well signposted in the 'vision' and expanded on in the subsequent issues and objectives. The vision successfully captures the key challenges and opportunities that currently exist and look likely to evolve into the next plan period.</p>	<p>- Candidate Site assessments are being carried out as part of a separate process. The results of this assessment will be published at a later stage.</p>
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**00193/VIO/2/002 - Do you agree with the issues identified? If not, how and why do you think they should be changed?**

<b>Comment</b>	<b>Officer Response</b>
<p>The projected significant increase in housing need in Wales and, particularly Newport is a critical issue that has been sufficiently identified. Latest household estimate figures for Wales highlight the ongoing trend over the last 30 years for an increase in households, mainly due to increases in one-person and two-person households, which remained the most common household types in Wales, based on these estimates. A greater emphasis should be placed on housing type and tenure when addressing housing growth. Recognising that this ongoing trend for the increase in the formation of one and two person households is likely to continue through the plan period, points to a clear need</p>	<p>- Support noted.  - The mix of housing types and tenure will be considered in further detail as the plan progresses.  - Candidate Site assessments are being carried out as part of a separate process. The results of this assessment will be published at a later stage.</p>

<p>for the provision of additional smaller homes in the City to accommodate for this growth and cater for smaller households. New sites need to consider the provision of a range and mix of homes to assist in addressing the demographic and affordability challenges facing Newport, as demonstrated at Wood Close (NGC(1)) and (Pontymason Lane (NGC(2))). The issue of climate change is at the forefront of all new development in Wales and its regions. It is important that we continue to make positive contribution toward addressing the causes of, and adapting to the impacts of, climate change. This can be achieved through reducing energy demand and promoting energy efficiency; developing a sustainable water strategy; aiming to use sustainable materials and minimise resource use, where possible; and the incorporation of green infrastructure, reduction of solar gain, passive ventilation, flood risk management, and sustainable drainage systems.</p>	
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**00193/VIO/2/003 - Do you agree with the Objectives for the RLDP? If not, how and why do you think they should be changed?**

<b>Comment</b>	<b>Officer Response</b>
<p>The objectives should perfectly align with the key issues facing Newport during the plan period. The starting point is growth. This agenda will be achieved by making existing places better for now and the future. Compromise is inevitable. The opportunity to improve existing places exists but will require greenfield land. Accepting this necessity enables the most otherwise sustainable outcome to be achieved. In doing so, the overall growth objective is not compromised.</p>	<p>- The need to facilitate sustainable growth is noted and recognised within the current drafting of the Vision, Issues and Objectives. This will be explored in further detail as part of the Growth and Spatial Options stage to follow.</p>

**00193/VIO/2/004 - Any other comments**

<b>Comment</b>	<b>Officer Response</b>
<p>Whilst listed in the anticipated evidence base, viability and deliverability is key to the implementation of any new development. Sufficient assessment and appraisal work should be undertaken to identify significant constraints early in the process, that would have a negative effect on potential viability.</p>	<p>Noted.</p>

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**The Coal Authority - 00324**

**Date Acknowledged:** 24.03.2022

**Date Received:** 23.03.2022

**00324/VIO/5/001 - Any other comments**

Comment	Officer Response
<p>Thank you for your notification received on the 31st January 2022 in respect of the above consultation.</p> <p>The Coal Authority is a non-departmental public body sponsored by the Department of Business, Energy &amp; Industrial Strategy. As a statutory consultee, The Coal Authority has a duty to respond to planning applications and development plans in order to protect the public and the environment in mining areas.</p> <p>Our records indicate that there are no recorded coal mining legacy features present at surface or shallow depth in the Newport City area that may pose a risk to surface stability. Records we hold also indicates that no surface coal resource is present in the area.</p> <p>On the basis that there are no recorded shallow coal mining legacy features present in the area the Planning team at the Coal Authority has no specific comments to make.</p> <p>Please do not hesitate to contact me should you wish to discuss this further.</p>	<p>Noted.</p>

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**Monmouthshire County Council - 00031**

**Date Acknowledged:** 19.03.2022

**Date Received:** 18.03.2022

**00031/VIO/1/004 - Any other comments**

Comment	Officer Response
<p>We have no specific comments to make on the Newport RLDP Draft Issues, Vision and Objectives. We look forward to continuing to work collaboratively with Newport City Council on cross boundary issues as part of our respective Replacement Local Development Plan processes.</p>	<p>Noted. We look forward to working collaboratively as our respect plans progress.</p>

John Harper - 00608

Date Acknowledged: 21.03.2022

Date Received: 18.03.2022

00608/VIO/1/001 - Any other comments

Comment	Officer Response
<p>Thank you for sending me a copy of the Newport development plan and the opportunity to respond.</p> <p>My suggestions for the plan fall under 3 headings ;</p> <ol style="list-style-type: none"><li>1. Best use of vacant space</li><li>2. Link the town centre to the Glebelands</li><li>3. Usk barrage</li></ol> <p>1 and 2 are not costly . I will provide further detail in my Formal response which will follow.</p> <p>I was born and bred in Newport.</p> <p>The views are entirely my own but I am a Fellow of the Royal Institution of Chartered Surveyors ,the Rating and Valuation Association and the Chartered Institute of Housing.</p> <p>My formal response will follow.</p> <p>-----</p> <p>Thank you for the opportunity to respond to your draft.</p> <p>I have consistently bemoaned the deterioration of the town centre. This is not the fault the council but there are issues that could be addressed without massive cost:-</p> <ol style="list-style-type: none"><li>1. Vacant Space. There are opportunities to improve the vacant space around the town centre such as the top of Cambrian Road (opposite the Station). This presents an opportunity for a much more welcoming feature to travellers entering the town, perhaps a bench or tree or both. Improvements at Maindee (opposite the Police Station ) could be added.</li><li>2. The opportunity for cycleways is enormous. Linking the town centre to the Glebelands via the riverside would enable access to an enormous green space and eventually link Caerleon and Severn locks.</li><li>3. The Usk Barrage could be a big lift to the City and create an environment to attract increased footfall and visit the transporter</li></ol>	<p>- Support noted and enthusiasm for the city welcomed.</p> <p>- The Vision, Issues and Objectives drafted broadly seek to address the issues raised, with particular regard for improving the vitality of the city centre and opportunities for improving active travel connectivity throughout the city. However, it is important to note that the purpose of the RLDP is to provide a framework which future development proposals may be considered against, and not to explicitly deliver such specific proposals.</p> <p>- How these objectives will be specifically implemented will be outlined in the more detailed policy development stage.</p>

<p>bridge , the Westgate and the Coldra.  This is not wishful thinking. Given a time period of 15 years it could be done alongside the refurbishment of the new Market and the Arcades.  Key to all of this is the Barrage. There is much to do here including gaining approval, engineering work and funding but if led and planned by the right people it would raise the whole quality of life for Newport and the surrounding area. If there is anything here you want to discuss please ring me or e-mail.  There is nothing in your draft with which I disagree. I believe my objectives tick many of the boxes contained in the draft and the national sustainable outcomes in Planning Policy Wales.</p>	
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**Axis Land Partnerships Ltd - 00625**

**Date Acknowledged:** 21.03.2022

**Date Received:** 18.03.2022

**00625/VIO/2/001 - Do you agree with the Vision for the RLDP? If not, how and why do you think it should be changed?**

<b>Comment</b>	<b>Officer Response</b>
<p>A vision for a Development Plan is essentially the foundation of the Plan and the framework against which the success of the Plan will ultimately be measured.  In our opinion, the vision is too long - they are often concise statements rather than a series of paragraphs. We also feel that the vision is too generic and could sit at the start of any city-based development plan and does not encapsulate what this particular Plan is seeking to achieve over the 15 year period.  The vision as currently written is more akin to one that you would expect to see at the start of a tourism destination strategy than a Development Plan. The creation of a City that has the attributes that currently comprise the vision is the outcome of successful implementation of the Plan. The policies and the allocations within the replacement Plan will define and deliver outcomes spatially - the Plan is the process/mechanism and so its vision should frame the Plan itself.</p>	<p>- The Vision for an LDP can take various forms, but ultimately needs to explain what the RLDP is seeking to achieve, respond to local circumstances and address the key issues for the area. It should be aspirational, clear and succinct.  - It is our view, having regard to the feedback received through this consultation, that the Vision as currently drafted appropriately achieves this as a whole.  - Importantly, the Vision serves an overarching role which is then distilled progressively into more detailed Objectives, and eventually measurable Policies, which set out how the plan will be delivered. Collectively, the RLDP serves as the framework, not just the Vision in</p>

	isolation.
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**00625/VIO/2/002 - Do you agree with the issues identified? If not, how and why do you think they should be changed?**

<b>Comment</b>	<b>Officer Response</b>
<p>Having challenged the vision for being overly generic, we again would seek more specificity in the nature of the issues and which ones are of particular importance in the Newport context over this Plan period. Many of the issues are longstanding and some will no doubt remain post this Plan - what are the acute/core issues now and for the next 15 years? It is those that should appear in this Plan.</p> <p>The way the document is currently set out, the issues are written as a series of questions and read as considerations for the Plan, not specific issues that it needs to tackle. Issues such as brownfield versus greenfield development site allocations are buried away in paragraphs on 'current situation'. This means the reader has to go looking and also be able to recognise what is an issue amongst substantial narrative.</p> <p>The issues should be set out in a much more overt, simpler format so that it is far clearer from the narrative what they are, what tensions, balancing, priority is needed in policy formulation later in the Plan's evolution.</p> <p>As written, the document does not spell out issues, rather it asks itself a series of questions that are embedded in narrative on current situation and among pages of objectives that themselves are laid out across too many topics.</p> <p>There are some extremely important issues identified such as the projected significant increase in housing need and for new sites to consider the provision of a range and mix of homes to assist in addressing the demographic and affordability challenges facing Newport. Climate change is another acknowledged issue, but it, like housing need is subsumed among all the other 'considerations'. Perhaps it is too early in the process to have the focus that we expect, but for the Plan to succeed, it needs to deliver on solving the core issues and there is a risk that in trying to cover off so many across so</p>	<p>- At this stage we are seeking to identify the extent of issues that the plan should address, many of which serve to help inform the evidence base we must compile ahead of the eventual Preferred Strategy. As some of these questions/issues are addressed through the plan preparation, the ultimate list of key issues for inclusion within the Preferred Strategy will be refined/consolidated.</p> <p>- While some of the issues identified may be considered "longstanding" or may "remain post this plan", it does not logically follow that they should not be addressed by this RLDP. Actions taken within the plan period can still positively improve the current situation for such issues moving us closer to achieving the overarching Vision.</p> <p>- It is important to reiterate that the format of the Vision, Issues and Objectives in the consultation paper do not represent a final format. The arrangement as proposed for the RLDP will be presented as part of the Preferred Strategy which will be consulted on at a later stage.</p> <p>- Comments regarding the number of issues and objectives identified are noted and will be considered as the plan development progresses through to the more detailed Preferred Strategy stage.</p>

<p>many topic areas that it will not be sufficiently impactful and end up just scratching the surface of some extremely important challenges by trying to be so many things.</p> <p>Essentially, a document like this should be concise and have a clearly auditable trail/flow from identification of issues, to the actions necessary to solve them, to finish with what the outcome will be, encapsulated in a vision statement. As drafted, the document has the flow in the wrong order.</p>	
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**00625/VIO/2/003 - Do you agree with the Objectives for the RLDP? If not, how and why do you think they should be changed?**

<b>Comment</b>	<b>Officer Response</b>
<p>In our opinion, the objectives are too generic, lack specificity and are somewhat utopian in what they set out to achieve. It is important that the objectives perfectly align with the key issues facing Newport. Central in that is the topic of growth and how it will be delivered over the Plan Period. There will inevitably be tensions and compromises and the objectives need to be framed accordingly to acknowledge that and seek to deliver growth sustainably and viably.</p> <p>As a general point, it is considered that in many cases, objectives could benefit from a definition of terms. For example the objective under Equality, Diversity and Inclusion starts with the words 'To create quality positive places'. It reads as if the statement is missing a comma, but even if it were, what is the definition of a 'positive place'? Other phrases/statement that could benefit from definitions include 'circular economy', 'geo-diversity' and 'green growth' among many others.</p> <p>A key failing of the objectives is that whilst some of them will be readily measurable, such as Transport and Movement, many aren't as they are simply high-level statements of general intent. When one looks back at monitoring and Plan review, how will one determine whether the objectives have been met when they are not S.M.A.R.T?</p>	<ul style="list-style-type: none"> <li>- The Vision and Objectives have been drafted based on the available evidence and in response to the key issues identified for Newport.</li> <li>Both the Vision and Objectives need to be aspirational to positively enhance Newport over the plan period and to accord with the test of soundness required by the Welsh Government's Development Plan Manual.</li> <li>- The amount of growth required and how it will be delivered over the plan period will be explored in further detail as part of the Growth and Spatial Options stage to come.</li> <li>- Key terms or phrases used in the RLDP will align with the definitions in National Policy, and where necessary will be explained either within the relevant supporting text or listed in a specific section of the plan.</li> <li>- We note the importance of monitoring the progress of the plan and the progress towards achieving the Vision and Objectives of the plan.</li> </ul>



	However, the measurable detail described as being necessary to evaluate this sits more appropriately with the detailed Policies which will follow each Objective. Further detail will be explored at the Policy drafting stage.
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**Usk Properties Ltd - 00391**

**Date Acknowledged:** 11.03.2022

**Date Received:** 11.03.2022

**00391/VIO/1/001 - Do you agree with the Vision for the RLDP? If not, how and why do you think it should be changed?**

Comment	Officer Response
I agree with the Vision for the RDLP.	Support noted.

**00391/VIO/1/002 - Do you agree with the issues identified? If not, how and why do you think they should be changed?**

Comment	Officer Response
Yes	Support noted.

**00391/VIO/1/003 - Do you agree with the Objectives for the RLDP? If not, how and why do you think they should be changed?**

Comment	Officer Response
Yes	Support noted.

**Lewis Homes (South Wales) Ltd - 00661**

**Date Acknowledged:** 08.03.2022

**Date Received:** 08.03.2022

**00661/VIO/2/001 – Cover Letter**

Comment	Officer Response
Savills is instructed by Lewis Homes (South Wales) Ltd ("Lewis Homes") to submit representations to the ongoing consultation on the Draft Vision, Issues and Objectives Consultation Paper ("DVIOCP"). It is	- Noted. - Candidate Site assessments are being carried out as part of a separate process and the results of this will be published at a later stage.

understood that this consultation is non-statutory but will ultimately inform the strategy and approach of the Replacement Local Development Plan ("RLDP") that is being prepared by Newport City Council ("NCC").

Lewis Homes controls the "Land at Coal Pit Lane, Castleton" (CS-0063) site and is committed to its promotion the RLDP. Whilst much of the DVIOCP is broad, uncontentious, and agreeable (as a document at this stage should be), Lewis Homes has comments to make with regards to the site's compliance with the principles that are set out within the document.

Given the nature of Lewis Homes' comments, they are provided in the form of this covering letter rather than on the forms provided.

**Background**

With over 50 years of experience, Lewis Homes is a family-run and South Wales headquartered SME housebuilder that has delivered in excess of 600 homes across South Wales and has a pipeline in place for a number of future sites.

Within NCC, Lewis Homes has entered into an option agreement on the site known as "Land at Coal Pit Lane, Castleton". The Site comprises of an irregularly shaped 1.75ha field within Castleton. It is improved grassland with hedgerows containing dispersed trees on its northern, western, and southern boundaries with its eastern boundary formed of lighter vegetation cover. The site's context is heavily urbanised with built development along its eastern boundary, the A48 forming its southern boundary, and the M48 close to its northern boundary.

Having been submitted as part of the Informal Call for Sites in November 2020, the site was submitted as part

<p>of the statutory Call for Sites in August 2021 where it was given the reference CS-0063. A Capacity Layout Plan for the site was submitted which showed that the site could deliver approximately 40 homes with a vehicular access from Coal Pit Lane. The submission was accompanied by a package of technical reports and survey data which considered matters such as transport, ecology, landscape, heritage, archaeology, drainage, and viability.</p>	
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**00661/VIO/2/002 - Do you agree with the Vision for the RLDP? If not, how and why do you think it should be changed?**

Comment	Officer Response
<p>Draft RLDP Vision Presented on Page 4 of the DVIOCP is a Draft Vision for the RLDP. Understandably, the Draft Vision is broad and non-contentious and accordingly there is little to be opposed by Lewis Homes. That said, it is assumed that where reference is made to "Newport" this relates to the NCC area in its entity rather than the city of Newport itself. This may seem a stylistic (and pedantic) point but is also an important one as clearly the towns and villages other than Newport within NCC will have an important role in delivering the RLDP's vision and meeting its requirements.</p>	<p>- Reference to 'Newport' or the 'City' within the Vision refers to the full extent of the Local Authority Area, not just the urban areas. All parts of Newport will play a significant role in achieving the overall Vision for the RLDP, which is subsequently reiterated in the proceeding Objectives. Amendment of the Vision is therefore not considered necessary to further elaborate this point.</p>

**00661/VIO/2/003 - Do you agree with the issues identified? If not, how and why do you think they should be changed?**

Comment	Officer Response
<p>Draft RLDP Objective - Population and Communities For each Draft Objective, bullet points are presented setting out the current situation before a series of questions are asked as to how the RLDP should respond. Given Lewis Homes' interests, further comments are provided with regards to a number of questions that are raised in the Draft Objective 2 - Population and Communities section of the DVIOCP.</p>	<p>- The need to identify the amount and types of homes required to support the population of Newport over the plan period is recognised. This will be explored in further detail as part of the Growth and Spatial Options stage to follow.</p>

What is Newport's population forecast for the next 15 years? And how many homes does Newport need to provide to meet this demand?

It is assumed that the RLDP will make use of the 2018-based household projections and, as set out in Edition 11 of Planning Policy Wales (PPW), this is the correct starting point for establishing the housing requirement. That said, it is essential that the RLDP housing requirement reflects that not only is NCC within a National Growth Area in Future Wales: The National Plan 2040 but that the strengthening of its role and function is a key priority for the South East Wales Region. It would seem that the housing requirement for the RLDP should be substantially greater than the 2018-based household projections such that it is similar to, or greater than, that in the adopted LDP.

How will the plan meet the identified housing needs by delivering a diverse range of new homes of different tenure, type and location in response to Newport's specific housing needs, ensuring that an appropriate proportion is affordable and accessible to all?

The Spatial Strategy should recognise that the RLDP has an important role in delivering a range of different types of housing and across the whole of NCC. Whilst PPW (and general good planning principles) suggest that previously development should be prioritised in the strategic search sequence, there is a recognition in the DVIOCP that there is a role that greenfield sites to play and these should be both around Newport itself but also the towns and villages within NCC to ensure that a suitable choice of different locations is created.

Where should these homes be located? And What are the most sustainable locations for urban expansion?

In effect, these two questions are broadly the same. On the basis that there is going to be a requirement for greenfield allocations, Lewis

Homes' is clear that Castleton is a suitable location for growth. This is because:

- There are sites (and the "Land at Coal Pit Lane, Castleton" site is an example) which are suitable, deliverable, and viable;
- There are a range of services nearby within Castleton and Marshfield that can be accessed on foot;

- Candidate Site assessments are being carried out as part of a separate process and the results of this will be published at a later stage.

<p>- Existing public transport and active travel routes provide connections to the broader range of services within Cardiff and Newport;</p> <p>- The Welsh Government is committed to enhancing the A48 as a corridor for active travel and public transport, with Castleton likely to benefit significantly from this.</p> <p>The level of growth will obviously need to be proportionate to its size, but there is a compelling case for some of these homes to be located in and around Castleton.</p>	
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**00661/VIO/2/004 - Do you agree with the Objectives for the RLDP? If not, how and why do you think they should be changed?**

<b>Comment</b>	<b>Officer Response</b>
<p>Draft RLDP Objectives</p> <p>Much of the DVIOCP is given over to 10 Draft Objectives for the RLDP. Again, these are fairly typical and noncontentious but it is nevertheless worth noting how the site being promoted by Lewis Homes performs strongly against each of them.</p> <p>Economy and Employment - The proposals will deliver an economic dividend, both at construction stage but also through increased Council tax and local expenditure when fully occupied. The site is strategically located such that employment opportunities in both Cardiff and Newport can be reached by a range of means of transport;</p> <p>Population and Communities - This is considered in more detail in the following section of the covering letter;</p> <p>Health and Well-Being - The proposed development's location will encourage active travel and this will be further enhanced by the measures proposed within the Welsh Government's "Cardiff to Newport Active Travel and Bus Corridors" consultation whilst incorporated into the Capacity Layout Plan for the site is usable public open space;</p> <p>Equality, Diversity, and Inclusion - A High Level Viability assessment submitted at Candidate Site stage confirms that the site can be compliant with the requirements set out in Policy H4 (Affordable Housing) of the adopted LDP with regards to affordable housing provision.</p> <p>These will be delivered in a way such that they are spread throughout the scheme;</p>	<p>- Support noted.</p> <p>- Candidate Site assessments are being carried out as part of a separate process and the results of this will be published at a later stage.</p>

Transport and Movement - A Transport Appraisal submitted at Candidate Site stage confirms that the site is located in a fundamentally sustainable location that is close to a range of services and accessible by active travel and public transport (the Welsh Government's "Cardiff to Newport Active Travel and Bus Corridors" consultation proposes the strengthening of these). The Transport Appraisal confirms that trips associated with the development will not have a material effect on the local highways network and that a vehicular access into the site can safely be delivered;

Natural Resources - Documentation submitted at Candidate Site Stage demonstrates that development of the site will not result in the loss of best and most versatile land, that the site is not within an Air Quality Management Area, and that development would not result in the sterilisation of usable minerals;

Biodiversity and Geodiversity - The site is not subject to any statutory or non-statutory ecological designations. A Preliminary Ecological Assessment submitted at Candidate Site stage confirms that the site's ecological value is derived from hedgerows which would be retained as part of its development and that a biodiversity net gain could be delivered through the strengthening of the hedgerows that form the site's boundaries, the planting of additional native trees and vegetation throughout, the provision of wildlife boxes, and the implementation of a sensitive lighting strategy;

Historic Environment - The site itself is not subject to any heritage constraints itself though a Scheduled Ancient Monument immediately abuts the site's eastern boundary. A Heritage Impact Assessment submitted at Candidate Site stage confirms that any impact of development of the site on its setting would be, at worse, "Minor Adverse". An Archaeological Assessment and Evaluation submitted at Candidate Site stage, which draws upon desk-based analysis and trial-trenching, confirms that there are no archaeological deposits predating the modern era.

<p>Landscape - The site itself is not subject to any statutory or non-statutory landscape designations. Whilst the site is located within a Green Wedge, the Landscape Position Paper submitted at Candidate Site Stage concludes that the removal of the site from the Green Wedge would have a negligible and inconsequential effect on its function and integrity as a whole with there being no perceived discernible reduction in the distance between Cardiff and Castleton;</p> <p>Climate Change - Whilst exact house types are yet to be determined, Lewis Homes can deliver a package of measures aimed at sustainability and responding positive to climate change. More fundamentally, the site's location is such that a meaningful proportion of trips will not be on motorised vehicles.</p> <p>The above re-affirms the conclusions of the Candidate Site submission; that the site itself is free from constraints that would fundamentally preclude development and can deliver against the Draft Objectives of the RLDP.</p>	
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**00661/VIO/2/005 - Any other comments**

<b>Comment</b>	<b>Officer Response</b>
<p>Conclusion</p> <p>These representations have been prepared on behalf of Lewis Homes as the promoter of the site known as "Land at Coal Pit Lane, Castleton". In short, Lewis Homes is supportive of the approach taken in the DVIOCP and believe that the land under their control performs strongly against the Draft Objectives of the RLDP. NCC recognise that the RLDP is going to trigger the need for greenfield allocations and the contents of this letter (combined with documentation submitted at Candidate Site stage) demonstrate that their site is one that is suitable, deliverable, and viable.</p> <p>Lewis Homes is committed to the promotion of the site through the RLDP and would welcome the opportunity to discuss the site with NCC when appropriate.</p>	<p>- Support noted.</p> <p>- Candidate Site assessments are being carried out separately from this process. Should further information or discussion be required they will be carried out as part of that process. The results of this assessment will be published at a later stage.</p>

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**Anon (RS) - 00708**

Date Acknowledged: 04.03.2022

Date Received: 03.03.2022

**00708/VIO/1/004 - Any other comments**

Comment	Officer Response
<p>We need a vibrant town centre with a proper public transport system, as in other towns./cities, this is accomplished using tram cars running on 3 rails, ie wireless.</p> <p>We also need decent pavements, lamposts should be positioned 2ft from kerb, as they should be (not against peoples boundary walls.)</p> <p>Pavement should be marked for Pedetsrians only, and wheeled veihcals,(mobilty scooters,prams, pushchairs,etc)</p> <p>Cyclists should be prohibited since this do over 4MPH</p> <p>Hope you take notice of what is wanted in this area EBBW BRIDGE</p>	<p>Noted. These broader matters will be considered as the plan progresses. It should be noted the technical matters raised are beyond the scope of the RLDP.</p>

**Friends Of Newport Ship - 00068**

Date Acknowledged: 03.03.2022

Date Received: 03.03.2022

**00068/VIO/3/001 - Do you agree with the Vision for the RLDP? If not, how and why do you think it should be changed?**

Comment	Officer Response
Yes, I agree	Support noted.

**00068/VIO/3/002 - Do you agree with the issues identified? If not, how and why do you think they should be changed?**

Comment	Officer Response
<p>Health &amp; Well-being:</p> <p>How can the plan create attractions for educational visits for families, to learn the history of Newport?</p> <p>Historic environment:</p> <p>Agree</p>	<p>- The suggested issue for Health and Wellbeing has been considered and it is our view that the current issues identified under the Historic Environment objective has appropriately captured this point. Based on the current drafting we fell that it should not be best placed against the Health and Wellbeing objective.</p> <p>- Support for the Historic Environment issues noted.</p>

**00068/VIO/3/003 - Do you agree with the Objectives for the RLDP? If not, how and why do you think they should be changed?**



Comment	Officer Response
<p>Historic Environment: Commendable objectives Tourism: There is very little mention of promoting Newport as a major tourist destination. It is features as one issue under "Economy and Employment" (p. 8). This should have more emphasis. The City Centre would be transformed if there was a major internationally famous tourist attraction at its centre. The conserved and displayed Newport Medieval Ship located in a refurbished Newport Museum, along with other maritime archaeological finds, would fit that bill. An Information Centre, Heritage trail etc. would direct visitors to the Transporter Bridge, the Cathedral, Tredegar House, Caerleon. Footfall in the town centre would be significantly increased, so that market forces would then bring in more shops and other facilities.</p>	<p>- Support noted. - The importance of tourism is recognised and is appropriately reflected in the vision and across multiple objectives. Consideration will be given to these points once we progress to the policy drafting stage. It should be noted that the role of the plan is not to deliver such tourist attractions or facilities, but to be the framework to support such development proposals in appropriate locations.</p>

**00068/VIO/3/004 - Any other comments**

Comment	Officer Response
<p>On the Planning Aid web pages, most of the videos are not available</p>	<p>Noted. Reference to those videos has been removed and will be uploaded onto the webpage as the RLDP progresses.</p>

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**Gwent Ornithological Society - 00040**

**Date Acknowledged:** 03.03.2022

**Date Received:** 22.02.2022

**00040/VIO/3/001 - Do you agree with the Vision for the RLDP? If not, how and why do you think it should be changed?**

Comment	Officer Response
<p>As Conservation officer for Gwent Ornithological Society, I only wish to comment on the vision concerning biodiversity. I broadly agree with the vision for biodiversity.</p>	<p>Support noted.</p>

**00040/VIO/3/002 - Do you agree with the issues identified? If not, how and why do you think they should be changed?**

Comment	Officer Response
I agree with the biodiversity issues identified,	Support noted.

**00040/VIO/3/003 - Do you agree with the Objectives for the RLDP? If not, how and why do you think they should be changed?**

Comment	Officer Response
I agree with the biodiversity objectives.	Support noted.

**00040/VIO/3/004 - Any other comments**

Comment	Officer Response
Enacting the biodiversity objectives, will require a huge ramping up of activity in this area of activity. This cannot be an add on, it must be central to all of the other objectives if you wish to make Newport an attractive City, as for example Cardiff is perceived. If you want investors to come to Newport you need to make Newport a green attractive place- it's current perception from colleagues is brown, urban and unattractive. The concentration on attracting investors without first improving the towns environment has been a major mistake thus far. Please use this replacement plan to correct this, to ensure long term vibrancy and success.	Noted. The importance of improving biodiversity as described is recognised, and has been drafted to sit across multiple of the Objectives drafted to reflect this.

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**Glamorgan Gwent Archaeological Trust - 00063**

**Date Acknowledged:** 03.03.2022

**Date Received:** 16.02.2022

**Summary of Comment 00063/VIO/3/004 - Any other comments**

Comment	Officer Response
Thank you for consulting us on this draft document; we welcome the opportunity to comment. You will be aware that we are retained by your Authority to give advice to you regarding archaeology and the historic environment, through our archaeological planning team and the heritage management team. Newport have adopted the Historic Environment Record which is curated by this Trust and holds data on the historic environment for south east Wales. The draft documents acknowledge the existing policies within both national Welsh Government and local government relating to archaeology	Comments and information noted. Consideration will be given to these points once we have progress to the policy drafting stage.

and the historic environment. We note that the draft Objective 3.8 for the Historic Environment is directly relevant in the draft Vision, Issues and Objective document.

To add to this, the aspects of archaeological and built heritage potential that may affect development of both new build and building conversions, are the importance and value of buried archaeological remains, the nature of historic buildings, and the impact on the setting of all historic assets. The document details that the origins of Newport as a current city primarily lie in the Roman, Medieval and post-Medieval periods, relating to maritime transport and trading, military and defensive aspects of settlement and industry and transport as well as religious and secular buildings. These have contributed to the current form and layout of the city and its environs. The areas of the Wentlooge, Mendalgief and Caldicot Levels, which are a Registered Landscape, are an important part of the historic environment in Newport's boundaries. We note the draft document details the numbers of statutorily and locally protected historic assets, to add to this there are at least 2,169 sites, features and artefacts noted within Newport's boundary noted on the Historic Environment Record; the much larger proportion of known assets are not protected.

Current legislation and policy is supported by the TAN24: the Historic Environment and a series of best practice guidance on managing change in the historic environment. Awareness of the archaeological and built heritage resource ensures identification of opportunities to mitigate impact prior to or during development, and also potential for enhancement and protection by design. The understanding of and managing change within this framework is also an opportunity to comply with the seven well-being goals in the Well-being of Future Generations (Wales) Act 2015, with archaeology and the historic environment feeding into all of these.

We welcome the positive outlook and proactive challenges posed in the draft, and also note that cross sector working brings positive

outcomes. The current Sector Adaptation Plan for the historic environment and climate change Historic Environment and Climate Change Sector Adaptation Plan (gov.wales) (<https://cadw.gov.wales/sites/default/files/2020-02/Adaptation%20Plan%20-%20FINAL%20WEB%20-%20English%20%281%29.pdf>) details aspects of proactive working, and the Welsh Archaeological Trusts have been undertaking Cadw funded projects to identify and monitor change. Proposed changes affecting the historic environment can best be mitigated by early consultation with us as your Authority's archaeological advisors. Factors from a historic environment aspect which may cause risk are change from both physical and development means, on a large scale or as accumulative impact from smaller events. It is also important to recognise that Planning Policy Wales refers to historic assets, including buried archaeological remains and built heritage, being preserved in situ as a priority, and preserved by record if preservation in situ cannot be achieved.

**Chris Thomas - 00709**

**Date Acknowledged:** 07.02.2022

**Date Received:** 01.02.2022

**00709/VIO/1/004 - Any other comments**

Comment	Officer Response
<p>English lesson On page 29, replace "anticipated" with "expected". Anticipate means to do something in advance of something else, eg I anticipated your error by sending you this message (if I knew that you were going to get it wrong). It is not the same as expected (Latin - ante, before, and capio, to take or undertake). Apart from that, the document is a pointless waste of time.</p>	<p>Noted. The Vision, Issues and Objectives are an important element of the local development plan making process and will inform the subsequent Growth and Spatial Options stage. We hope that you remain engaged as the RLDP progresses and offer constructive feedback in the interest of ensuring the RLDP best addresses the needs for Newport for the next 15 years.</p>

**Cadw Planning - 00005****Date Acknowledged:** 28.03.2022**Date Received:** 28.02.2022**00005/VIO/1/004 - Any other comments**

<b>Comment</b>	<b>Officer Response</b>
As a Welsh Government department we do not get involved with the development of the LDP but we grant aid GGAT to provide advice on the historic environment so it would be a good idea to invite them if you haven't already done so.	Noted. GGAT have submitted comments for consideration.

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**Bishton Community Council - 00015****Date Acknowledged:** 16.02.2022**Date Received:** 15.02.2022**00015/VIO/1/004 - Any other comments**

<b>Comment</b>	<b>Officer Response</b>
Bishton Community Council consider the Village Boundaries for Bishton Village and Underwood are not consistent with the villages and are haphazardly drawn with a lot of properties in the villages not within the boundaries for no apparent reason. This does not allow for reasonable growth particularly within Bishton village where only one sibling of an existing family have been able to locate within the village. Bishton Community Council would like to be involved with the LDP with recommendations for re-drawing of the boundaries to encompass the properties existing in the areas. BCC is available for any on site walk arounds or meetings you could involve us with as we were for the last LDP revision which BCC submitted suggestions for revised Village boundaries. I would like to add Bishton now has a very good Book a Bus service and a village farm shop. Bishton Village hall also has a 3phase electrical connection for a vehicle charging point if required.	Noted. The appraisal of village boundaries will be carried out in consultation with the relevant stakeholders as the plan progresses.