

Agenda



Newport City Council

Date: Tuesday, 11 May 2021
Time: 5.00 pm
Venue: Via MS Teams Live Event
To: **All Members of the City Council**

WEBCASTING NOTICE

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If you have any queries regarding this, please contact the Democratic Services Manager.

Item	Wards Affected
1. <u>Preliminaries</u> <ul style="list-style-type: none">i. To receive any apologies for absence.ii. To receive any declarations of interest.iii. To receive any announcements by the Mayor.	
2. <u>Appointment of Mayor/Chair of Council</u>	
3. <u>Appointment of the Deputy Mayor</u>	
4. <u>Appointment of the Leader of the Council</u> To make an appointment of the post of the Leader of the Council. The Leader may then announce appointments of Cabinet Members and the Opposition Group Leaders may announce any Shadow Cabinet appointments, if they so wish.	
5. <u>Appointments to Chairs of Committees</u> To appoint chairs to the Planning and Licensing Committees; Scrutiny Committees and the Democratic Services Committee.	
6. <u>Appointments to Committees</u> To give effect to appointments of members to Committees by the	

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Date of Issue: Tuesday, 4 May 2021

political Groups.

7. Appointments to External Bodies
To give effect to appointments of members to external bodies.
8. Formal commencement of the Newport Replacement Local Development Plan (Pages 3 - 226)
9. Live Event
To view the Live Event, click on the link below:

Microsoft Teams

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Report

Council

Part 1

Date: 11 May 2021

Subject **Formal commencement of the Newport Replacement Local Development Plan**

Purpose To approve the submission of the Delivery Agreement and Review Report for the replacement Local Development Plan (LDP) to Welsh Government. Approval by Welsh Government would signify the formal commencement of the process to replace the Newport Local Development Plan.

Authors Acting Head of Regeneration, Investment and Housing

Ward All wards.

Summary Newport's LDP is now over six years old and in accordance with the regulations needs to be reviewed to ensure it remains appropriate and relevant to changing demands in Newport. The Review Report (RR) is a key part of the LDP evidence base. In summary, it sets out the key legislative, national and policy changes that have occurred since the adoption of the LDP in 2015 and includes an assessment of the current LDP to evaluate what policies are working and which policies may need review.

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

Following Cabinet's decision to progress with a review of the LDP in October 2020, a Review Report (RR) and Delivery Agreement (DA), required by Regulations, have been drafted and were made available for public consultation during January – March 2021. Recommended responses to the feedback and suggested amendments to the documents have been collated for approval. Once these documents are endorsed by Council, the next stage is for them to be submitted to Welsh Government for approval. The formal submission of these documents to Welsh Government is a Full Council decision as this triggers the legal commencement of the LDP review, which will impact on the whole of Newport.

Proposal **Council** is asked to approve the submission of the Delivery Agreement and Review Report for the Replacement Local Development Plan (RLDP) to Welsh Government. Approval by Welsh Government would signify the formal commencement of the process to replace the Newport Local Development Plan.

Action by Acting Head of Regeneration, Investment and Housing

Timetable Immediate

This report was prepared after consultation with:

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

Signed

LDP BACKGROUND

The Newport Local Development Plan (2011-2026) was adopted in January 2015 and became the development plan for Newport. The LDP includes policies which are used to determine all planning applications within Newport. The LDP also includes land allocations for new housing, employment land and other growth areas. In addition, it contains policies which help to preserve and protect Newport's most special environmental and built assets. It is an important document for directing where growth and development can occur, and just as importantly, where it should not occur. Some of the positive outcomes of the current LDP are:

- 5,978 new homes have been built during the Plan period so far (April 2011 – March 2020)¹.
- 1,223 of these new homes have been affordable (over 20%).
- A total of 667 new homes were built in 2019/20 - 267 of these were affordable homes (40%), which represents the highest recorded numbers for affordable homes in the Plan period so far.
- 94% of major residential development has occurred on brownfield land.
- Almost 26ha of new employment land has been created since 2011.

To ensure that LDPs are kept up-to-date, local planning authorities are required to commence a full review of their plans at least once every four years following plan adoption, or sooner if there are significant concerns with a plan's implementation. Following informal discussions with Welsh Government officers, and considering the strong performance of Newport's LDP, a review at four years was not considered necessary. However, the LDP was six years old in January 2021 and it is considered that a review is now needed in order to ensure that the Plan continues to respond to the challenges and opportunities in Newport for the next fifteen years. As reported in the October 2020 Annual Monitoring Report, a full LDP review is recommended for the following reasons:

- Newport's LDP was 6 years old in January 2021. Welsh Government officers are strongly urging us to review;
- Many of Newport's larger housing sites have now been successfully completed. There is a need to identify further growth sites;
- Newport has been specifically identified within a Centre of National Growth in the new Future Wales: National Plan 2040. A new LDP will help to acknowledge and facilitate these growth aspirations;
- The current LDP expires in 2026 and if we do not start the process now, there is a risk that Newport's LDP will expire and we will have a policy vacuum, leaving us susceptible to 'planning by appeal';
- A revised LDP will help to boost economic recovery, particularly following Covid. It will also be more intrinsically linked to the objectives and priorities of Newport's Well-being Plan.

REVIEW REPORT

Background

In October 2020, Cabinet agreed for a review of the LDP to begin. The draft Review Report (RR) sets out the first stage in this process. The RR is a key part of the evidence base underpinning the form and context of the reviewed plan. The RR has been informed by the recent public consultation², the adopted monitoring framework set out in the current LDP, contextual changes to legislation and relevant strategies, as well as the collation and analysis of other evidence to make an informed and robust conclusion.

Consultation Feedback

¹ Please note that the count for April 2020 to March 2021 is currently taking place.

² A list of those bodies consulted is available in Appendix C of this report.

The consultation period saw 25 individual stakeholders provide comments on the draft RR. These comments are set out in full in Appendix A of this report. Each comment has been considered and a recommended response and any proposed amendment to the RR is also set out in Appendix A. It is important to note that changes to the adopted LDP, as identified in the RR, can only be made at plan revision stage and therefore the recommended Council response reflects this.

A consultation form with five specific questions along with a general comments section was provided (see background papers); 12 of the 25 respondents utilised the form. The response rate was not particularly large, but the responses showed a general trend which is set out below.

The majority of respondents...

- ...thought that the main issues that should be considered in the full LDP review were identified in the RR.
- ...thought that the existing vision, issues and objectives remain relevant for a revised plan.
- ...agreed that the adopted Spatial Strategy of a new plan needs reviewing.
- ...agreed with the findings of the policy review.
- ...thought the plan needed to be revised, however there was confusion on what this meant with most stating they wanted both a short and full form revision. A few comments were made that questioned whether all elements of the plan required full revision.

The consultation responses raised the following key points:

- The involvement of the Future Generations Commissioner for Wales, noting that planning is a priority area in delivering the well-being goals.
- The value and importance of the Gwent Levels, with requests to halt any development within that location. The impact of the large renewable energy schemes was a real concern.
- With the Welsh Government declaration of a biodiversity and climate change emergency, the effectiveness of current policy to protect and enhance ecology was raised.
- A support for the continuation of a brownfield strategy and the need to ensure the plan strategy does not lead to social detriment.
- The role and importance of mineral planning for Newport and the region.
- Lost opportunity in Newport for access to the river for recreation and lifeboat services.
- Agree with the need to review the tourism policy and how important this is to Newport economically.
- The need to take into account the impact from Covid 19 and to use planning as a tool to aid recovery.
- The importance and opportunities that result from Heritage and its role in the Newport Offer.
- The need to focus on the regeneration of the City Centre.
- The opportunities arising from national and regional public transport improvements.

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

Conclusion

It is concluded that the updated Review Report (see Background Papers) sets out a clear and robust overview of the issues that need to be considered by a replacement LDP. There is a need to look at the spatial strategy and at a minimum, consider those matters raised in the policy review section. The Draft

Review Report concluded that a Full Revision of the current LDP is required and this remains the conclusion following the consultation process.

DELIVERY AGREEMENT

Background

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

Consultation Feedback

The consultation period saw 15 respondents provide comments on the draft DA. These comments are set out in full in Appendix B of this report. Each comment has been considered and a recommended response and any proposed amendment to the DA is also set out in Appendix B.

The consultation responses raised the following key points:

- Support for the proposed timetable;
- Helpful links to stakeholders that had not been identified in the draft DA were provided;
- Questioned the impact on engagement with Covid-19;
- Enforced the need for transparency of decisions making through the RLDP process.

In light of the responses, no significant changes have been proposed or made to the DA and no changes to the proposed timetable have been requested or made. In terms of the impact of Covid 19 on engagement practices, all engagement and consultation stages of the RLDP will have regard to any lockdown or restrictions in place. Any appropriate adjustments, including re- scheduling of consultation will be considered at each stage of the plan preparation. The request for transparency is an important one. Feedback and clarification of processes in plan preparation are important and each stage of the plan preparation will be undertaken in line with government guidance.

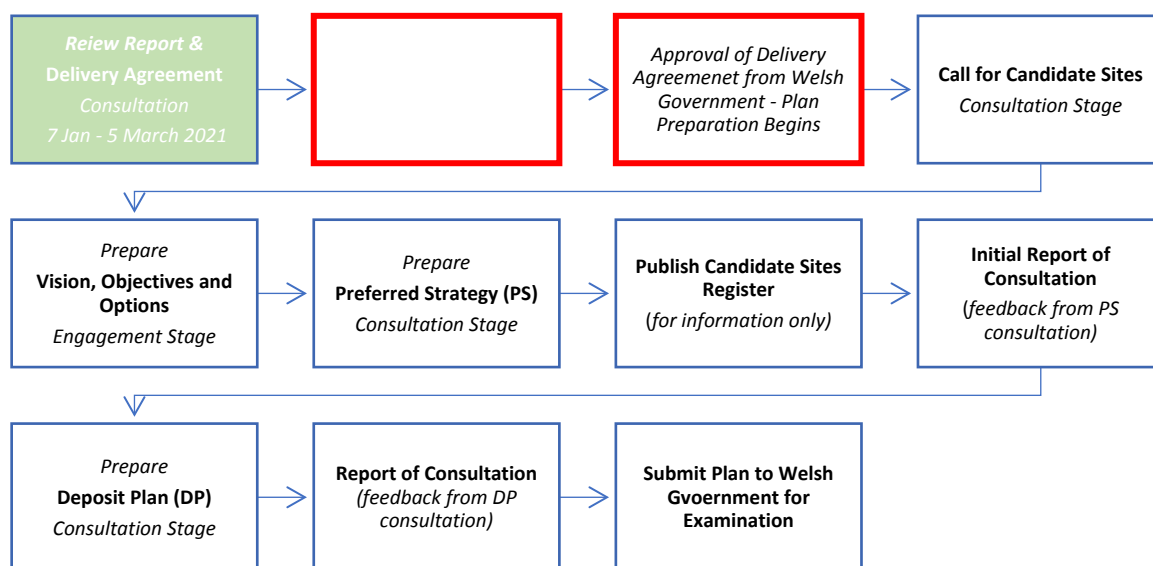
Conclusion

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

Next Steps

Following endorsement of these documents, the next step will be to formally submit the RR and DA to Welsh Government. Agreement of the DA marks the legal and formal start of the plan preparation/revision process and binds the Council into delivering within the stated timescales and using agreed consultation processes. The DA will be made available online, hardcopies can be requested and it shall also be available for public access (by appointment). The DA will need to be kept under review and any future changes required to the DA will need to be confirmed and agreed with Welsh Government.

The table below sets out the next stages in the development of the RLDP. When the Delivery Agreement is endorsed by Welsh Government, that is the start of the LDP process and the first stage will be a call for potential development sites, known as the Call for Candidate Sites. This is anticipated to be undertaken over an 8-week period starting in June 2021.



Financial Summary

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

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

LDP Reserve (£654,000)	395,600	217,200	133,800	0
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Risks

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

Links to Council Policies and Priorities

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

Options Available and considered

1. Endorse the updated Review Report and Delivery Agreement for submission to Welsh Government.
2. Amend the updated Review Report and Delivery Agreement for further consultation / submission to Welsh Government.
3. Do not approve the updated Review Report and Delivery Agreement for submission to Welsh Government.

Preferred Option and Why

1. To endorse the updated Review Report and Delivery Agreement, which has taken into account feedback from public consultation, and formally submit the documents to Welsh Government for approval. This option will provide Newport with an opportunity to update the LDP within its new context of legislation, regulations and social, economic and environmental context to ensure it is providing the most appropriate and ambitious policy framework for Newport. A revised LDP would also ensure the benefits of continuing a strong plan-led approach that provides effective and consistent planning decisions and certainty for investment and minimises undesirable speculative development. The Delivery Agreement clearly sets out the methods and timing of engagement and provides clarity to those interested in the RLDP process of their role and opportunities to inform and influence the outcome of the plan.

Comments of Chief Financial Officer

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

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

Comments of Monitoring Officer

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

Comments of Head of People and Business Change

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

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

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

Comments of Cabinet Member

The Cabinet Member for Sustainable Development

The current LDP has achieved some excellent outcomes, particularly in respect of facilitating much needed affordable housing. However, it was adopted in 2015 and is now in need of a refresh. A replacement LDP will continue to deliver Newport's growth aspirations, but will also protect our best historical and environmental assets from unacceptable and unsustainable development. Public consultation has already gathered initial views on what people want the replacement LDP to cover and address. The importance of continuing to engage and consult our communities across Newport is crucial in creating a strong and sustainable new LDP for the city, and this is something we are entirely committed to, as set out in the Delivery Agreement and Community Involvement Scheme

Local issues

The LDP will affect all wards in Newport.

Scrutiny Committees

None

Equalities Impact Assessment and the Equalities Act 2010

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

Children and Families (Wales) Measure

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

Wellbeing of Future Generations (Wales) Act 2015

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

sustainable development. The 5 main considerations are set out below with an explanation of how this work meets their objective:

- Long term:** An LDP sets out a vision for how places are expected to change in land use-terms and this provides certainty for developers and the public. The monitoring and review process of the LDP provides an opportunity to look back on what has worked and take the time to update the plan to take a look at what Newport will need to plan for over the next 15 years.
- Prevention:** The aim of the LDP and indeed planning is to create sustainable places. This approach will look to tackle issues such as safety, flood risk, health, air quality, amenity, availability of jobs, energy efficiency and carbon reduction, opportunities for skills and education as well as the protection of cultural facets. All options that will help create spaces which prevent negative impacts on health and wellbeing, environmental and economic factors.
- Integration:** The LDP will have regard to the local well-being plan and other relevant corporate strategies and policies. The review process will take into account those council policies and strategies that have been created since the adoption of the LDP in 2015. The influence of the LDP covers many service areas as well as external organisations and these stakeholders will play an important role in the development of the plan.
- Collaboration:** The LDP has to consider its impact on its neighbouring authorities and there is much work being done within the region which will provide part of the evidence base and influence the policy outcomes for Newport e.g. flood risk impact from the catchment. We will also work with a range of other partners to ensure that we are working together effectively on shared ambitions and aspirations. The LDP review process has to investigate and consider joint approaches to creating an LDP and this will be reported.
- Involvement:** A key aspect of the LDP process is engagement. The adoption and adherence to the Delivery Agreement and the Community Involvement Scheme is a key element of the process. This approach provides a clear timescale and approach for effective and efficient engagement.

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

Crime and Disorder Act 1998

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

Consultation

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

Background Papers

Post Consultation Delivery Agreement & Review Report

- Appendices 08a and 08b

LDP – Draft Review Report & Draft Delivery Agreement Consultation Forms

- Appendices 08c and 08d

LDP – Draft Review Report & Draft Delivery Agreement

- Appendices 08e and 08F

Click on the link below to view the -

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

Dated: 4 May 2021

APPENDIX A- CONSULTATION COMMENTS AND RECOMMENDED RESPONSES – REVIEW REPORT

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Consultation Form Responses:

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

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

APPENDIX B- CONSULTATION COMMENTS AND RECOMMENDED RESPONSES – DELIVERY AGREEMENT

Draft Delivery Agreement

Consultation January -March 2021

Comments Received and recommended Council Responses

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

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

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

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

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

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

Consultation Form Responses:

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

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

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

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

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

Specific consultation bodies

- 1 Welsh Government (Planning Division will co-ordinate consultations)
- 2 Natural Resources Wales
- 3 Cadw
- 4 Network Rail Infrastructure Ltd
- 5 Office of Secretary of State for Wales
- 6 Telecommunication Operators – EE, Vodafone and 02, BT Virgin Media, Mobile Operators Association
- 7 Aneurin Bevan Health Board
- 8 Gas and Electricity Licensees – National Grid, Wales & West Utilities, Western Power Distribution, British Gas and SSE
- 9 Sewerage and Water undertakers – Dwr Cymru/Welsh Water
- 10 Department for Transport (including Secretary of State for functions previously exercised by the Strategic Rail Authority)
- 11 UK Government Departments – Department of Business, Energy and Industrial Strategy
- 12 Home Office
- 13 Ministry of Defence

Neighbouring Local Authorities:

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

Community Councils:

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

General Consultation Bodies:

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

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

Newport Local Development Plan

Delivery Agreement

May 2021



**Creu Lleodd Cymru
Placemaking Wales**

Llofnodydd y Starter Charter Signatory



NEWPORT
CITY COUNCIL
CYNGOR DINAS
CASNEWYDD

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This document is available in Welsh / Mae'r ddogfen hon ar gael yn Gymraeg

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I. Executive Summary

1.1 The Local Development Plan (LDP) is about the future development of Newport, and the Council is keen to let everyone have a say in the development of the city. The first step has been to agree a timetable so people know when they can contribute, and when they can expect a response to their input. Chapter 3 sets out the Council's proposed timetable. Any individual or organisation can be involved in the shaping of the LDP, but community involvement is particularly encouraged through a **Community Involvement Scheme (CIS)**. More information on how the community can be involved is given in Chapter 4.

The Council undertook consultation on the Draft Delivery Agreement between January and 5 March 2021

1.2 A Local Development Plan has to be prepared according to the rules set down by Welsh Government. This means that the general soundness of the Plan will be decided by an independent inspector appointed by the Welsh Government. In setting out the process in this Delivery Agreement, maximum opportunity is given for input to the Plan and for consensus to be built as far as possible. It is important therefore to be involved early on and to put forward **your** views.

1.3 The inspector will be interested in all the evidence on each aspect of the Plan. The Plan cannot be prepared in a vacuum of course, and will need to take account of all relevant factors, including:

- existing development
- the wider context, including neighbouring Authorities
- planning policy guidance, regulations and other relevant plans and strategies from the Welsh Government

1.4 The Replacement Local Development Plan will be the key document for determining the sort of places in which we live, work and take our recreation. It will be a key means by which we look after the environment for the benefit of this and future generations. We hope that you will read this report and will take time to be involved in shaping the future of Newport: the city, the surrounding villages and countryside.

1.5 Please note that if you or your organisation are not already registered to be involved, you can do this through the Council's website: www.newport.gov.uk/ldp, by email to ldp.consultation@newport.gov.uk, by telephoning 01633 656656 or by writing to: Planning Policy Team, Room 707, Newport City Council, Civic Centre, Newport, NP20 4UR.

2. Introduction

- 2.1 The Newport Local Development Plan (LDP) was adopted by the Council on 27 January 2015 and sets out the Council's planning framework for the development and use of land in Newport over the period 2011 – 2026. To ensure that LDPs are kept up-to-date, local planning authorities are required¹ to commence a full review of their plans at least once every four years following plan adoption, or sooner if the findings of the Annual Monitoring Reports indicate significant concerns with a Plan's implementation. Newport City Council has produced a Review Report that sets out the proposed type of review, i.e. full plan review, and those key factors for consideration for a replacement plan. Alongside the Review Report the Council is required to produce a Delivery Agreement which sets out the timetable and engagement strategy for the plan preparation. This Delivery Agreement, once approved, will be submitted to Welsh Government and will be the basis for the production of Newport's replacement LDP. The replacement LDP will cover the period 2021-2036.

■ Purpose of a Delivery Agreement (DA)

I. Timetable

Setting out the preparation and adoption of the replacement LDP, Integrated Sustainability Appraisals, Annual Monitoring Reports and Supplementary Planning Guidance

2. Community Involvement Scheme (CIS)

Indicating how the Council will involve consultation bodies and the public in the preparation of the Plan

- 2.2 This Delivery Agreement is an important part of the plan preparation process. It is an essential project management tool which sets out the processes of plan preparation, making clear the opportunities and methods of engagement required by legislation, regulations and Welsh Government guidance. It also sets out the resources and timescales involved. A glossary of terms can be found in Appendix 4. There are two key aspects to a DA:
- 2.3 This document is the Delivery Agreement that has been made available for consultation. The document will be revised following the consultation period. Once the final draft is completed, this will be sent to Full Council for approval and following this, it shall be submitted to Welsh Government (WG) for agreement. Once agreed by WG, the Delivery Agreement will be made available on the Council's website and will be made available in hard copy at the Council's Information Station and/or the Newport Civic Centre (clearly indicated at the start of each key stage consultation). A review of progress will be undertaken at each key stage of the replacement LDP (RLDP).

¹ Town and Country Planning (LDP) (Wales) Regulations 2015 (SI 2015 No. 104) Part 4, Section 54

■ Preparation of RLDP

2.4 In preparing the RLDP, the Council will aim to achieve the following key outcomes, in accordance with the Welsh Government LDP Manual (Edition 3, 2020):

- Support sustainable development and quality places based around the National Sustainable Placemaking Outcomes, being aligned with national policy set out in Planning Policy Wales (PPW) and integrated with an SA/SEA/HRA, including Welsh language and the requirements of the Well-being of Future Generations Act 2015.
- Be based on and underpinned by early, effective and meaningful community involvement in order to understand and consider a wide range of views, with the aim of building a broad consensus on the spatial strategy, policies and proposals of the RLDP.
- Be based on a robust understanding of the role and function of the Newport area including the functional linkages to areas beyond our administrative boundaries.
- Be distinctive by having plans setting out clearly how Newport will develop and change, giving certainty for communities, developers and businesses.
- Be resilient to climate change (using the latest UK climate projections, flood risk and vulnerability assessment data) and support the transition to a low carbon society in line with the latest carbon reduction targets and budgets as set out in the Environment (Wales) Act (Part 2). The principles of Placemaking, the Sustainable Transport Hierarchy and the Energy Hierarchy as set out in PPW must be adhered to.
- Ensure the sustainable management of natural resources in accordance with the Environment (Wales) Act 2016 and other relevant legislation.
- Deliver what is intended through deliverable

and viable plans, taking into account necessary infrastructure requirements, financial viability and other market factors.

- Be productive and responsive with plans, kept up-to-date and flexible to accommodate change.

2.5 The RLDP will be prepared with regard to a wide range of legislation, policies and other initiatives at the international, national, regional and local level. The Local Well-Being Plan (LWBP) will be of particular importance at the local level. The LWBP relates to the economic, social, environmental and cultural well-being of Newport and has clear links with the RLDP where it relates to land use planning.

■ Integrated Sustainability Appraisal & Habitat Regulations Assessment

2.6 An Integrated Sustainability Appraisal², (SA) incorporating Strategic Environmental Assessment³ (SEA) and Welsh Language Impact Assessment (LIA), is a statutory requirement of LDP preparation in order to assess the environmental, social and economic implications of the Plan's strategy and policies. The SA/SEA process is utilised to ensure that policies in the LDP reflect sustainable development principles and take into account the significant effects of the plan on the environment. SA, incorporating SEA, was an iterative process throughout the preparation of the adopted LDP and is reflected in the Plan's proposals and policies.

2.7 The Council will undertake an Integrated Sustainability Appraisal (ISA) as set out above but shall broaden the scope of this integrated assessment to ensure that it also captures a few other impact assessments. This approach will assess the contribution the RLDP can make to the Well-Being Goals and ensures a collaborative approach on a variety of issues, recognising links between them and avoiding duplication of work. This holistic and integrated approach will ensure that as well as the SA, SEA and LIA (noted above)

² Section 62 (6) Planning and Compulsory Purchase Act 2004

³ European Union Directive 2001/42/EC & Environmental Assessment of Plans and Programmes (Wales) Regulations 2004

the integrated assessment will include as a minimum an Equalities Impact Assessment (EIA), Health Impact Assessment (HIA) and a clear understanding of how the Welsh well-being goals are influencing the plan. For future reference, the Integrated Sustainability Appraisal should be considered to include the broader assessments as noted above. The ISA process will run concurrently with the plan making process and forms an iterative part of plan preparation.

2.8 The ISA will be undertaken as follows:

- An **Integrated Sustainability Appraisal Scoping Report** identifies the existing sustainability issues in the Newport area and provides baseline information along with a review of plans, policies, programmes and strategies. The existing SA indicators and objectives will be revised and updated as necessary. A revised Sustainability Framework will be produced.
- An **Initial Integrated Sustainability Appraisal Report (ISAR)** predicts and evaluates the effects of the LDP options, spatial strategy and strategic policies on the social, environmental and economic objectives as set out in the Scoping Report. The ISAR will be published at the same time as the Preferred Strategy and updated when the Deposit Plan is prepared.
- A **Final Integrated Sustainability Appraisal Report (SAR)**. This will bring together all elements of the ISA and take into account the binding recommendations of the Planning Inspector. The Final ISAR will be published following receipt of the Inspector’s Report.
- An **Integrated Sustainability Appraisal Adoption**

Statement will be published to explain how the sustainability considerations and the Sustainability Assessment have been taken into consideration in the production of the RLDP.

2.9 In addition to the ISA process, there is a requirement for the Council to also undertake a **Habitat Regulations Assessment (HRA)** as part of the plan preparation process. The Habitats Directive⁹ requires that land use plans, including LDPs, are subject to an additional Habitats Regulations Assessment where there are sites of European significance for nature conservation purposes. Newport contains European nature conservation designated sites including the River Usk Special Areas of Conservation and The Severn Estuary Special Protection Area and RAMSAR⁵ site. Habitats Regulations Assessment will be undertaken alongside ISA to ensure an integrated approach to assessment.

2.10 There are two stages to a Habitat Regulations Assessment, both of which are only required if stage 1 concludes there is the potential for adverse effects:

2.11 It is intended that the process will again run concurrently with the Plan making process and form an iterative part of Plan preparation.

■ Evidence Base

2.12 The Review Report sets out the need to update and undertake evidence base assessments throughout the plan preparation period. It is anticipated that the following assessments will be required as part of the RLDP process:

Stage 1: Screening

To determine whether any of the conservation objectives of the designated sites could be adversely affected.

Stage 2: Appropriate Assessment

An assessment of the plan on the conservation objectives of the designated sites.

⁵ A Ramsar site is a wetland site designated to be of international importance under the Ramsar Convention. The Convention on Wetlands, known as the Ramsar Convention, is an intergovernmental environmental treaty established in 1971 by UNESCO, which came into force in 1975

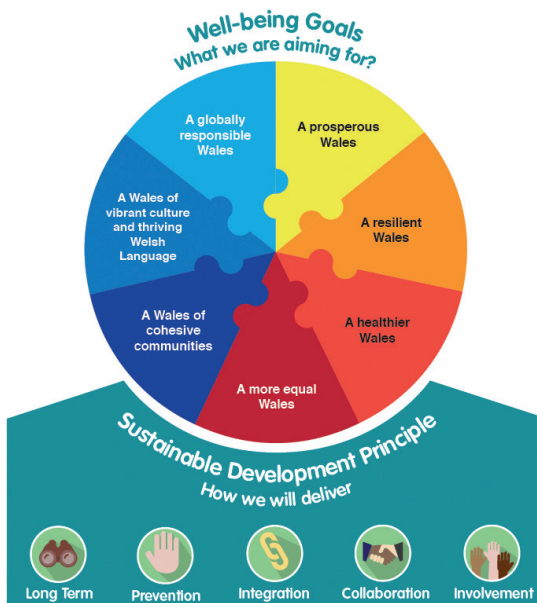
- Population and Household forecasts
- Local Housing Needs Assessment
- Employment Land Review
- Affordable Housing Viability Assessment
- Gypsy and Traveller Accommodation Needs Assessment
- Strategic Flood Consequence Assessment
- Retail and Leisure Study
- Green Infrastructure Assessment
- Renewable Energy Assessment
- Landscape Assessment

2.13 Please note this is not a definitive list and additional evidence base update requirements may emerge as the RLDP process progresses.

■ Well-being of Future Generations (Wales) Act 2015

2.14 The Well Being of Future Generations (Wales) Act (WCFG) gained Royal Assent in April 2015. The Act aims to make a difference to the lives of people in Wales in relation to seven well-being goals and sets out five ways of working, as set out in figure 1 below:

Figure 1: Well-Being Goals & Ways of Working



2.15 Given that sustainable development is the core underlying principle of the LDP (and ISA), there are clear associations between both the LDP and the WCFG Act. As a requirement of the Act, a Local Well-being Plan (LWBP) must be produced. This plan will look at the economic, social, environmental and cultural well-being of the city and will have clear links with the RLDP. The timescales for the development of an updated Well-Being Plan for Newport are anticipated to overlap and this will aid in the development of both plans. Both the WCFG Act and the LWBP will be considered fully throughout the preparation of the RLDP, which will follow the five ways of working.

■ Tests of Soundness

2.16 The Replacement LDP will be submitted to the Welsh Government for examination. An independent Inspector is appointed by the WG to undertake this examination to determine whether the Plan is fundamentally sound. 'Soundness' is an integral part of the LDP system and is an important principle by which it may be demonstrated as to whether the LDP shows good judgement and is able to be trusted. If the RLDP is found not to be sound, then the Welsh Government will require the Council to take necessary action to remedy the situation.



2.17 At examination, the Inspector will assess whether the preparation of the plan has been undertaken in accordance with legal and regulatory procedural requirements and complies with the Community Involvement Scheme. The Inspector must also determine whether the Plan meets the three soundness tests⁶:

2.18 Following Examination, the Inspector will produce a report that sets out their findings and conclusions. The conclusions set out in the report will be binding and, unless the Welsh Government intervenes, the Council must accept the changes required by the Inspector and adopt the RLDP.

**Test 1
Does the
Plan fit?**

(i.e. is it clear that the RLDP is consistent with other plans?)

**Test 2
Is the Plan
appropriate?**

(i.e. is the Plan appropriate for the area in the light of the evidence?)

**Test 3
Will the Plan
deliver?**

Will the Plan deliver?
(i.e. is it likely to be effective?)



Belle Vue Park bandstand

⁶The tests of soundness can be found in the Welsh Government Local Development Plan Manual <https://gov.wales/development-plans-manual-edition-3-march-2020>

3. Timetable

- 3.1. The Council must set out a timeline for plan preparation, setting out the various stages and documents and key stages of public consultation. The Welsh Government have set an expectation that a replacement LDP should not take longer than 3.5 years, plus one three-month slippage period. Newport has an adopted Local Development Plan (2015-2026) currently in operation and will continue to do so while the new plan (the replacement LDP) is prepared.
- 3.2. Table I sets out the key stages of plan preparation. A more detailed project plan is included in Appendix B. The timetable is

split between Definitive and Indicative Stages. Stage 1-4 are noted as Definitive stages because the progression of these stages are in direct control of the Council. Every effort will be made to adhere to this timetable. Stages 5-8 are noted as indicative because these stages are dependent on various factors including the number of representations received during Deposit Plan consultation or the number of examination hearing sessions required. The Council has less control over these factors. Therefore, stages 5-8 will be reconsidered after reaching the Deposit stage of the plan where definitive timings will be prepared and submitted to the Welsh Government for agreement and publication.

Table I: Summary Timetable

Key Stages		Definitive Timescales
Stage 1 Delivery Agreement	Public Consultation Full Council Approval and Submission to WG Approval from WG	January – March 2021 May 2021 May 2021
Stage 2 Pre-Deposit	Candidate Site Stage Consultation on Integrated Sustainability Appraisal Vision and Objective/Growth Options Prepare Preferred Strategy Full Council reporting Preferred Strategy	June – Sept 2021 June – August 2021 July 2021 – Jan 2022 Jan – July 2022 July 2022
Stage 3 Preferred Strategy	Public Consultation Prepare Deposit Plan Full Council reporting Deposit Plan	August - October 2022 January – August 2023 September 2023
Stage 4 Deposit Plan	Public Consultation Full Council approval for submission to WG	October – December 2023 April 2024

Indicative		Timescales
Stage 5	Submission	May 2024
Stage 6	Examination	June 2024
Stage 7	Inspector's Report	January 2025
Stage 8	Adoption	February 2025
		Total Plan Preparation 3.5 years (plus 3 months slippage period)

■ Resources

3.3. The Development Services Manager will be responsible for the overall delivery of the RLDP, with the Planning Policy Manager responsible for the day-to-day project management. The Planning Policy Team will lead in the preparation and delivery of the RLDP with Member engagement and political reporting at appropriate stages.

3.4. The staff resources are set out in Table 2 below, approximately 90-95% of officer time will be dedicated to the RLDP to account for day to day involvement in liaison with colleagues in development management and also to account for regional working.

3.5. Additional time will be dedicated by the Head of Regeneration Investment and Housing and the Development Services Manager to the efficient delivery of the RLDP. It will also be necessary to call upon staff resources from other internal departments to assist in undertaking various evidence base updates/ assessments. This is likely to include officer support from: Development Management, City Services, Policy and Partnership, Housing, Highways, Regeneration and Economic Development, Education, Democratic Services and Legal Services.

Table 2: Indicative⁷ Planning Policy Team Structure

Officer Job Title	Number of posts
Planning Policy Manager	1
Principal Planning Policy Officer	1
Senior Planning Policy Officer	1
Planning Policy Officer	1
GIS and Technician	1

⁷ Business Case for proposed structure currently being considered

3.6 The Council recognises that additional professional specialist services will also be required to progress and establish a robust evidence base to inform the RLDP. While it is anticipated that a considerable amount of evidence base work will be undertaken by NCC officers, the use of external consultants will be necessary, particularly in relation to highly technical/specialist elements of the evidence base. Financial resources have been secured accordingly.

3.7 It is important to note that work is on-going on a regional basis and collaboration with neighbouring authorities will continue to be fundamental to the preparation of the RLDP, particularly with regard to a joint evidence base, where appropriate. The South East Wales Strategic Planning Group (SEWSPG) is working towards a set of regionally agreed methodologies for key topic areas to ensure a consistent evidence base throughout the Cardiff Capital Region. In addition, Monmouthshire, Torfaen, Blaenau Gwent, Newport and Caerphilly Councils have jointly procured a number of joint evidence base studies and future work joint work with these authorities and Cardiff are anticipated.

3.8 A dedicated budget has been made available to progress the RLDP to adoption within the proposed timetable. It is anticipated that this will cover expenditure relating to all elements of preparation of the RLDP and the Independent Examination.

Risk management and Analysis

3.9 The proposed timetable is considered to be realistic and achievable having regard to:

- The scope of work understood to be involved in plan preparation, having regard to the WG regulations and guidance;
- The resources the Council has committed to plan preparation; and
- The current structure of the Council, its decision-making structures and meeting cycles.

3.10 While every effort will be made to avoid deviation from this timetable, it is acknowledged to be challenging. Appendix D identifies a number of potential risks, together with the Council's proposed approach to managing them.

Supplementary Planning Guidance (SPG)

3.11 The RLDP will contain sufficient policies to provide the basis for determining planning applications. However, SPG has an important supporting role in providing more detailed or site-specific guidance on the way in which LDP policies will be applied. While SPG does not form part of a Development Plan it should be derived from and be consistent with the relevant LDP. The SPG should also be clearly cross referenced to the policies and proposals it supplements.

3.12 Since the adoption of the current LDP, 23 supplementary planning guidance (SPG) documents have been produced to support key LDP policy areas. It is anticipated that the SPG topic list below will continue to be relevant and necessary. Where these can be updated or revised as part of LDP process, to reflect the changes to the RLDP and its evidence base, this will be done. However, it is important to note that the SPG linked to the RLDP cannot be formally adopted until after the Inspector's Report has been received and there are no changes to the policy approach set out in the RLDP. It is not anticipated that any new or additional SPG will be prepared in parallel with the RLDP due to challenging timescales.

- Planning Obligations SPG
- Affordable Housing SPG
- Archaeology and Archaeologically Sensitive Areas SPG
- Wildlife and Development SPG
- House Extensions and Domestic Outbuildings SPG
- New Dwellings SPG



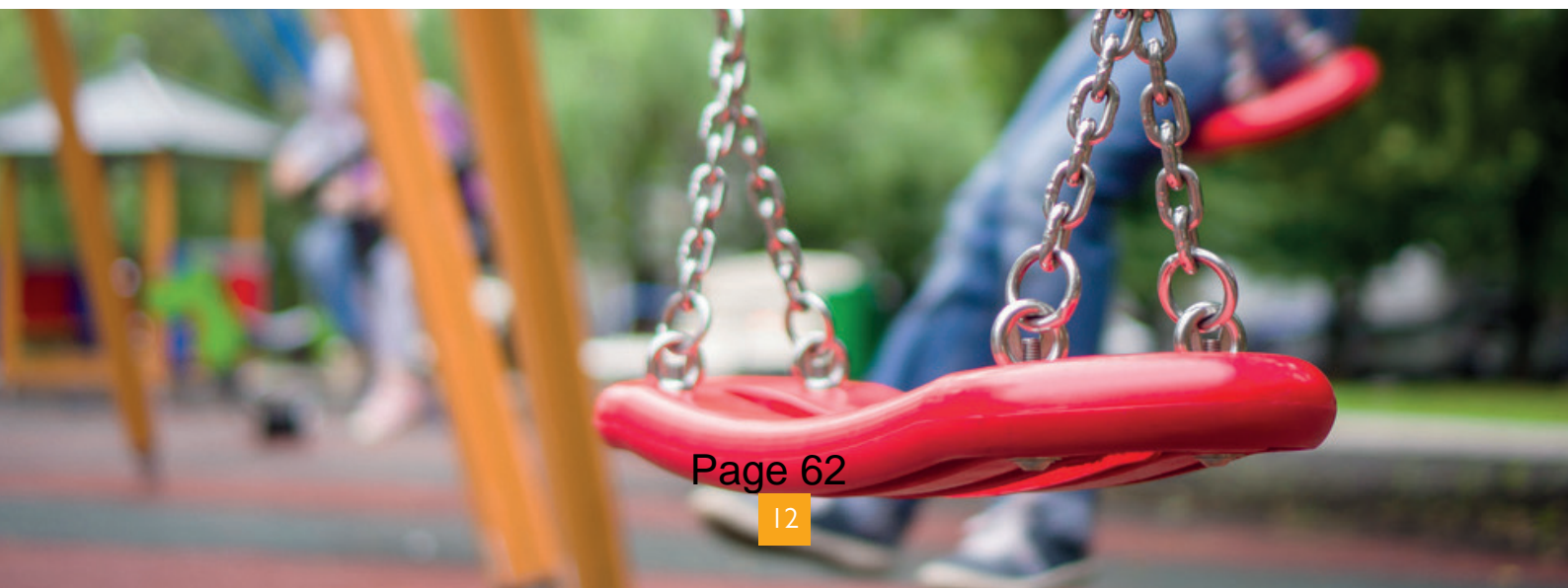
- Flat Conversions SPG
- Waste Storage and Collection SPG
- Parking Standards SPG
- Housing in Multiple Occupation SPG
- Draft Shopfront Design SPG
- Sustainable Travel SPG
- Security Measures for Shopfronts and Commercial Premises SPG
- Mineral Safeguarding SPG
- Outdoor Play Space Provision SPG
- Trees, Woodland, Hedgerows and Development Sites SPG
- Air Quality SPG
- Caerleon Conservation Area Appraisal SPG
- Stow Park Conservation Area Appraisal SPG
- Clytha Conservation Area Appraisal SPG
- The Shrubbery Conservation Area Appraisal SPG
- Draft City Centre Conservation Area Appraisal SPG
- Draft St Woolos Conservation Area Appraisal SPG

Monitoring and Review

3.13 The Council will continue to monitor and review progress of the RLDP against the requirements of the Delivery Agreement to ensure the timetable is being kept to and the public engagement as set out in the CIS is being met. As noted in paragraph 3.1, the timetable allows for a marginal degree of flexibility, however, any significant amendments to the DA will require approval by the Council prior to Welsh Government agreement. The DA may need to be amended if the following circumstances, which are beyond the LPA's control, occur during the preparation of the revised LDP:

- Significant change to the resources available to undertake preparation of the RLDP.
- Preparation of the RLDP falls behind schedule by more than 3 months at a key stage.
- Significant changes to Legislation directly affecting the RLDP preparation process.
- Any other circumstances that will materially affect the delivery of the RLDP.
- Significant changes to the Community Involvement Scheme.

3.14 An updated timetable will be submitted to WG following the Deposit stage. This will provide greater certainty on the timescale for the remaining stages (currently set out as indicative stages in Table 1). This indicative part of the timetable will be redefined within three months of the close of the formal Deposit period and will be submitted to WG for agreement.



4. Community Involvement Scheme

4.1 The Community Involvement Scheme (CIS) sets out how the Council proposes to proactively involve the community and other stakeholders in the preparation of the Replacement Local Development Plan (RLDP). Whilst it is the responsibility of the Council to produce the RLPD, one of the aims of the development plan system is to produce a plan based on effective community involvement. This process of building consensus on the context of the RLDP is a key aspect of this CIS and the five ways of working prescribed by the Well-Being of Future Generations Act. The following section sets out the ways in which you and other interested parties can influence the RLDP. The opportunities for involvement for each key stage of the plan preparation process are set out below; this should be read in conjunction with the timetable set out in Chapter 3 and Appendix 1).

4.2 Welsh Government set out in 2011 a set of ten national principles for public engagement. They are a set of non-statutory principles and are designed to provide guidance when undertaking the engagement and participation process. They are an overarching set of principles aimed at public service organisations across all sectors in Wales. The Principles for Public Engagement for Wales are:

1. Engagement is effectively designed to make a difference
2. Encourage and enable everyone affected to be involved, if they so choose

3. Engagement is planned and delivered in a timely and appropriate way
4. Work with relevant partner organisations
5. The information provided will be jargon free, appropriate and understandable
6. Make it easier for people to take part
7. Enable people to take part effectively
8. Engagement is given the right resources and support to be effective
9. People are told of the impact of their contribution
10. Learn and share lessons to share the process of engagement

It is considered appropriate to utilise these principles in the preparation of the RLDP. This is reflected in this document and engagement will take place in accordance with the guidelines set out in this CIS.

Who will we involve?

- 4.3 Effective involvement of people and communities and collaboration with other organisations are two of the five ways of working set out in the Well-Being of Future Generations Act and are a key aspect in the preparation of the RLDP. The Council will seek to involve the following groups in the plan preparation:

Members of the public, businesses, landowners, developers and agents

- 4.4 The Council has a RLDP database which is being maintained to include details of any parties who have requested to be kept informed of the Replacement LDP process. This database allows contact with groups beyond those set out in regulations.
- 4.5 Extensive engagement will be undertaken at each key stage of the RLPD process. Efforts will be made to engage with communities, businesses, local organisations and charities, landowners, and developers to ensure a broad range of feedback. We shall engage with a variety of interest groups including community councils, the citizens panel, chambers of commerce, planning agents, prospective developers and groups including local wildlife trusts, community groups and young people.
- 4.6 The call for candidate sites will provide the opportunity for those who have an interest in land to submit sites to be considered for development. We will be making one formal call for candidate sites and all candidate sites will need to be submitted via a standardised form. The forms contain the criteria required to assist in the assessment of the suitability of sites for inclusion as potential allocations in the RLDP. Accordingly, all submissions must be made at the appropriate time, the dates of which will be advertised extensively using the methods set out below.
- 4.7 The RLDP database automatically keeps a record of any party who has provided representations to the RLDP process. By providing representations or requesting to be added to the database those parties are giving their consent for their details to be held by the Council for the RLDP process. If you would like to be added to the RLDP database, please contact the planning policy team using the details set out in section 4.22.

Elected Members

- 4.8 Newport elected members will play an important role in the RLDP process by, informing

the policy team of issues and opportunities within Newport and their local areas as well as continuing to represent their local communities. Consequently, member seminars will be undertaken where appropriate, anticipated to be at the key stages of the RLDP development.

Community Councils

- 4.9 Community Councils play a key role in disseminating information within their local area and will be a key link in effective involvement within their local areas. Community Councils will be consulted at every stage of the RLDP process and they are encouraged to take this opportunity to raise awareness of this to their local communities. Community Councils are also a source of information for RLDP development and are also encouraged to provide issues and opportunities for their areas including any land use based aspirations.

Partnership groups

- 4.10 Liaison with Newport's Public Service Board⁸ will be of particular importance to ensure that the RLDP aligns with the Local Well-Being Plan. The PSB also represents a broad coverage of interested parties and their involvement in the RLDP process will aid the RLDP through the provision of data and evidence base as well as broadening the scope of engagement with parties that have had limited or no contact with the development plan process in the past, but with an interest in Newport.

Additional Consultation Bodies

- 4.11 Appendix A provides a list of the specific and general consultation bodies⁹ along with UK Government departments and other consultees. The specific consultees comprise of the Welsh Government and those bodies with specific functions that apply to the revised Plan area, for example the Aneurin Bevan Health Board. The Authority must also consult UK Government Departments where aspects of the plan appear to affect their interests. These consultation bodies will be engaged throughout the RLDP process at each of the formal stages and informally, as appropriate.

⁸ <http://www.newport.gov.uk/oneNewport/Well-being-of-Future-Generations-Act/Public-Services-Board.aspx>

⁹ Those Specific and General Consultation bodies as set out in the RLDP Regulations.

Hard to Reach Groups

4.12 Hard to reach groups and those that are seldom heard are those groups who have not taken part traditionally in the plan preparation process. Additional effort will therefore be required to ensure these groups are engaged in the RLDP process. A flexible approach will need to be undertaken in relation to engagement with these groups, albeit within the parameters of the specified participation/consultation periods. Engagement with these groups may be achieved by using existing partnerships and groups wherever possible. It is nevertheless recognised that the very principle of a hard to reach group is that they may not be involved in existing groups and that this may not therefore always be achievable. Trusted intermediaries will also be used, as appropriate, in order to gain the views of particular groups of people who do not have the confidence to engage directly in the process.

4.13 The following groups are identified as not having been sufficiently engaged in plan preparation previously and will subsequently be actively encouraged to participate in the RLDP process:

- Young People – Newport’s Youth Council will be invited to participate as appropriate in the RLDP process. The RLDP covers a fifteen-year period and as such the plan is as relevant and will have a direct impact on young people. It is therefore considered key that the voices of young people are heard so that they can share their views on their local area.
- Disabled People – we will seek to engage with an appropriate stakeholder group(s) at relevant stages, in order to gain the views of those living with disabilities in Newport.
- Gypsy and Travellers – we will seek to engage with an appropriate stakeholder group(s) at relevant stages to ensure the gypsy and travelling community are suitably engaged.
- Black and Minority Ethnic (BME) People – we will seek to engage with appropriate BME stakeholder group(s) are suitably engaged at relevant stages of the plan.

4.14 In addition to the above hard to reach groups

there are other seldom heard voices who are considered to have been under-represented previously in LDP preparation. This includes (but is not exclusive to) those seeking affordable housing in the County, agricultural related development, small/self-build house-builders and small and medium-sized enterprises. Accordingly, we will endeavour to reach out to these groups by utilising existing mutual points of contact wherever possible.

■ How will we involve you?

4.15 We will seek to publicise the RLDP process at every stage and reach as much of the community as possible, as set out in the section above, to inform people about the RLDP stage and how they can get involved. This will be done by:

- Direct contact (i.e. by letter or e-mail, the preference of which as indicated by the stakeholder through consultation, together with language preference).
- Via Newport Council’s social media accounts and use of Bus wifi.
- Engagement with Members through specific workshops, Member drop-in sessions and in reports to appropriate Council meetings.
- Making use of existing networks such as Newport’s Citizens Panel, Youth Council, Cohesive Communities Team.
- All RLDP information and documents will be made available on the Council’s website.
- Deposit of documents at the Council’s Information Station and or Civic Centre.
- Press releases where appropriate, including the use of Newport Matters.
- Public information exhibitions, engagement sessions and meetings will be undertaken face to face when possible when taking into account Welsh Government guidance on such matters. Virtual engagement and consultation via web based technological tools such as webinars will also be utilised.

Welsh Language and Bilingual engagement

4.16 The Welsh Language Standards place a legal duty on Councils to make it easier for people to use services through the medium of Welsh. The Council has published a Welsh Language Strategy (2017-2022) which sets out a vision that 'the people of Newport can use Welsh in all parts of life'. The requirements of both the corporate strategy and Welsh Language Standards will be maintained at each stage of the RLDP. Bilingual engagement will be carried out in the following ways:

- We welcome correspondence in both Welsh and English. Where correspondence is received in Welsh and a reply is necessary, this will be sent in Welsh.
- All comments forms, public notices will be bilingual. Stakeholders on the RLDP database will be sent RLDP correspondence in their preferred language.
- Any pages on the Replacement Local Development Plan website and social media posts will be bilingual.

■ What we expect from you

- 4.17 In order to ensure any comments and representations on the RLDP are considered, they must be submitted within the prescribed timescales. Chapter 3 of this Delivery Agreement sets out the timetable of relevant stages and provides a guideline of when we will seek your involvement. This will ensure that individual views are considered and taken into account throughout the RLDP preparation process.
- 4.18 It is also of importance that you notify the Planning Policy team should your contact details change during the RLDP process in order for us to keep you fully informed of progress. With regard to Candidate Sites, it is noted that land ownership changes may also occur during the process and it is imperative that these are communicated to the Planning Policy Team in order to ensure progress is not delayed.

Building Consensus

- 4.19 The Council will seek to build consensus through the various engagement and consultation methods set out within the CIS. Consensus building can only be achieved if the community and other interested parties are kept fully informed and effectively engaged throughout the preparation of the RLDP, which will be of particular importance in the early stages of plan preparation. It is nevertheless recognised that there will be occasions where consensus cannot be achieved and a difference in opinion between certain parties occurs. A clear audit trail of decisions will be maintained in order to ensure that there is transparency in the decision making process, and, to provide assurances to those that disagree, that the decisions have been made in an informed and balanced way.

Late Representations

- 4.20 The RLDP preparation process is subject to statutory and non-statutory consultation periods which have defined periods for representations to be made. Responses are required to be submitted to the Council by the specified deadline of the specific consultation period in order for them to be considered. Any late comments/representations will not be logged as 'duly made' as they were not made in accordance with the published timescales. In exceptional circumstances it will be at the Council's discretion as to whether such late representations can be accepted. Evidence will be required to highlight why the representation was delayed and that a genuine attempt was made to submit within the prescribed deadline. Please use the contact details set out below to inform us of any such event. The timescale to produce the RLDP continues to be challenging, the acceptance of late representations could result in further delay which would not be acceptable.

Availability of Documents

- 4.21 The RLDP documents will be made available at each of the relevant stages. All documents will be available electronically on the Planning Policy pages of the Council's website at www.newport.gov.uk/ldp. The RLDP

webpage will have a link to online consultation forms which can be used to make and view representations on various documents relating to the Plan. In addition to online availability, the documents will also be available in paper copy at the Council's Information Station and/or the Newport Civic Centre (clearly indicated at the start of each key stage consultation). As a result of the Covid-19 pandemic and potential future lockdown situations, it might be necessary to book appointments to view a paper copy. The location of paper copies and the process for viewing them will be clearly set out at the start of any consultation.

- Email: ldp.consultation@newport.gov.uk
- Telephone: **01633 656656**
- Post: **Planning Policy, Newport City Council, Civic Centre, Newport, NP20 4UR**

■ Timetable and proposed Method of Engagement

4.24 Tables 3 & 4 sets out the detailed timetable for community engagement and the proposed engagement methods for the key stages in the RLDP preparation process. The list is not exhaustive and may be adapted to ensure the community and stakeholders are suitably involved at each stage. The proposed methods of engagement will vary dependent on the stage of plan preparation, subject matter, preference of those involved and the resources available at the time, recognising that the proposed timetable and methods should not hinder plan preparation.

■ Our Contact Details

- 4.22 For more information on the Replacement Local Development Plan please visit www.newport.gov.uk/ldp
- 4.23 If you would like to contact a member of the Planning Policy Team, please use one of the following methods:



4.25 Figure 1 sets out a summary of the process and indicates where engagement will occur, and feedback provided. It is worth noting that each stage of the RLDP process influences the next stage. The Integrated Assessment work informs and influences the output of each stage.

4.26 In light of the Covid-19 pandemic, method of engagement will need to reflect the Coronavirus Regulations (2020) and Ministerial advice. Should restrictions still be in place during a key consultation stage, arrangements will need to be made to ensure social distancing measures and other adjustments can be put

in place when conducting public engagement events to ensure the safety of our colleagues and our communities. The use of digital involvement options to provide communities with information and the ability to engage with the RLDP in a virtual manner will be utilised. Details of the nature of each consultation period and the arrangements for the methods for engagement will be made clear on the Council's website and correspondence sent to those on the RLDP database. It is anticipated that a mixture of public event and virtual engagement mechanisms will be utilised throughout the plan preparation process.

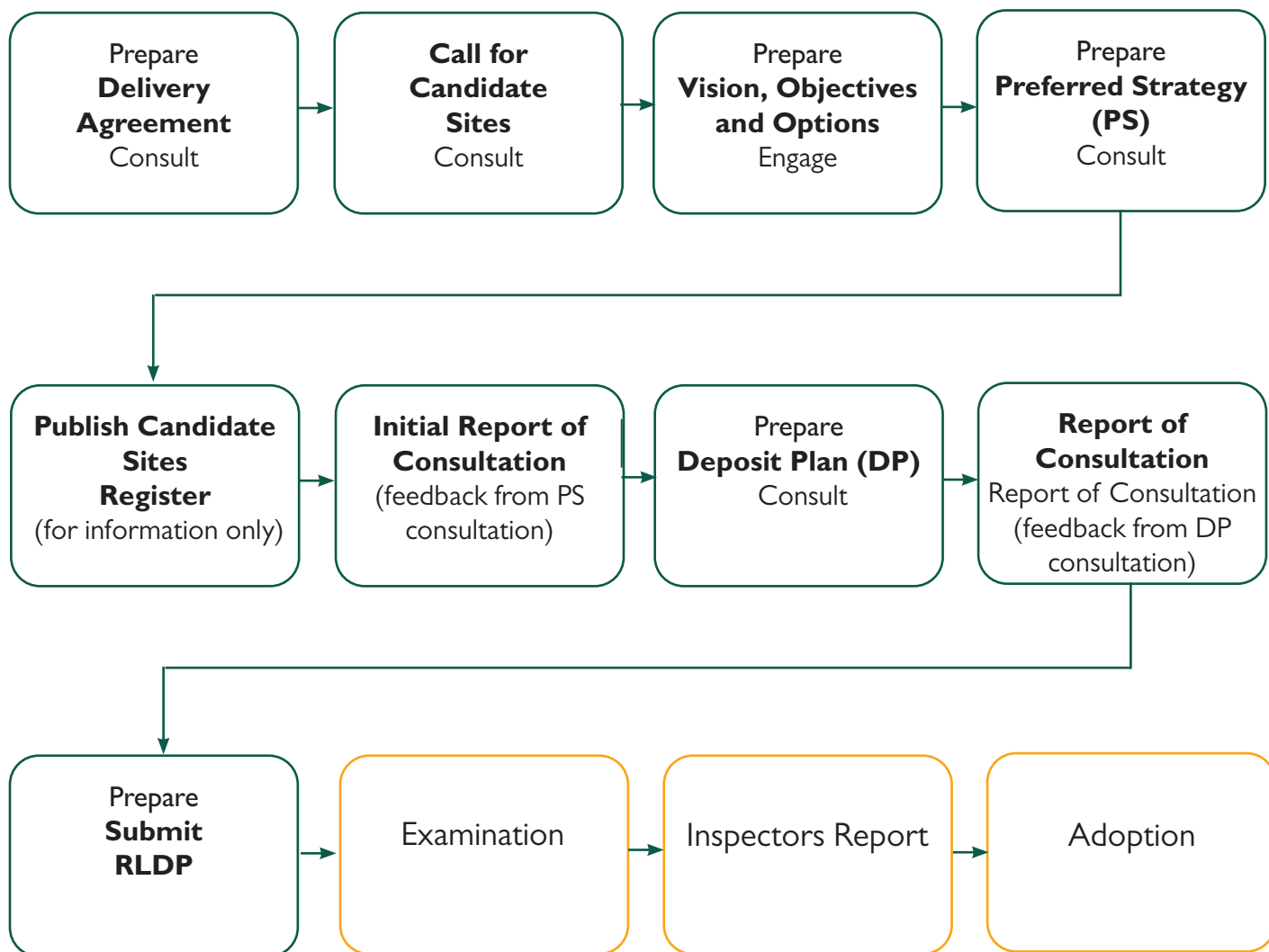


Figure 2: Summary of RLDP process, including engagement and feedback points

Table 3: Community Involvement timetable and proposed methods of engagement - Definitive Stages

Key Stage	Purpose	Consultation Period	Who will be involved	Method of engagement	Outcomes / Reporting Method	LDP Regs ¹⁰
Delivery Agreement	To set out timetable for plan preparation and process and methods of community engagement	January 2021 – March 2021	<ul style="list-style-type: none"> • Specific Consultation Bodies • General Consultees • Registered LDP database • Elected Members • Community Councils • General Public • Public Service Board 	<ul style="list-style-type: none"> • Email • Letter • Website • Social Media • Press Release 	<ul style="list-style-type: none"> • Draft DA approval for consultation Cabinet Dec 2020 • DA approval for submission to WG 2021 	2005 Regs: 9 & 10 2015 Regs: 2 (5)
Review and Update Evidence Base	To inform the RLDP strategy and policy framework	Any update or new evidence base will be reported and made available for comment at the Growth Options, Preferred Strategy and Deposit Plan stage (see below)	<ul style="list-style-type: none"> • Local Authority Departments • Members • Neighbouring LPAs • Consultants • Statutory Consultees 	<ul style="list-style-type: none"> • Email • Letter • Website • Social Media • Press Release • Workshops/ Meetings 	<ul style="list-style-type: none"> • RLDP AMR • RLDP Topic Papers • Technical Reports and Studies 	2005 Regs: 11
Call for Candidate Sites	To establish land availability, by establishing those areas which landowners are seeking to release land for development in order to identify potential development sites	June 2021- August 2021	<ul style="list-style-type: none"> • All representors within the RLDP database, including • Landowners • Agents • Developers • HBF • Federation of Small housebuilders • General Public 	<ul style="list-style-type: none"> • Email • Letter • Website • Social Media • Press Release 	<ul style="list-style-type: none"> • Candidate Sites Register 	2015 Regs: 2 (1)

¹⁰ Business Case for proposed structure currently being considered

Key Stage	Purpose	Consultation Period	Who will be involved	Method of engagement	Outcomes/ Reporting Method	LDP Regs ¹⁰
Review and Update ISA ¹¹ baseline and framework	To update the baseline information and define a new ISA framework	June 2021- August 2021	<ul style="list-style-type: none"> • All representors within the RLDP database, including • Specific Consultation Bodies • Neighbouring Authorities • SA/SEA consultees 	<ul style="list-style-type: none"> • Email • Letter • Website • Social Media • Press Release • Workshop/ Meeting 	<ul style="list-style-type: none"> • Report as part of ISA Scoping Report (see below) 	
<ul style="list-style-type: none"> • Review Vision, Issues and Objectives • Develop Growth Options • ISA and HRA scoping work to be reported as part of ISAR (see below) 	To develop consensus on options including growth levels and spatial distribution to inform the Preferred Strategy (see below)	July 2021- January 2022		<ul style="list-style-type: none"> • Email • Letter • Website • Social Media • Press Release • Workshops/ Meetings 	<p>Documentation made available on the Council's website.</p> <p>Draft Preferred Strategy and Initial Integrated Assessment Report and Initial HRA Scoping Report.</p>	2005 Regs: 14
Preferred Strategy Consultation	To enable anyone to make representations to the Council's pre-deposit document	August 2022 – October 2022	<p>All representors within the RLDP database, including</p> <ul style="list-style-type: none"> • Specific and General Consultation Bodies • Neighbouring Authorities • General Public • Hard to Reach Groups • Community Councils • Public Service Board 	<ul style="list-style-type: none"> • Email • Letter • Website • Social Media • Press Release • Exhibitions/ Workshops/ Meetings 	Initial Consultation Report	<p>2005 Regs: 15 & 16</p> <p>2015 Regs: 16A</p>

¹¹ Integrated Sustainability Appraisal, see section 2.6 for further details

Key Stage	Purpose	Consultation Period	Who will be involved	Method of engagement	Outcomes/ Reporting Method	LDP Regs ¹⁰
Initial Integrated Sustainability Appraisal Report (IASR) and HRA Scoping Report Consultation	To enable anyone to make representations to the Council's ISAR	August 2022 – October 2022	All representors within the RLDP database, including <ul style="list-style-type: none"> • Specific and General Consultation Bodies • SA/SEA Statutory Consultees • Neighbouring Authorities • General Public • Hard to Reach Groups • Community Councils • Public Service Board 	<ul style="list-style-type: none"> • Email • Letter • Website • Social Media • Press Release • Workshop/ Meeting 	Initial Consultation Report	2005 Regs: 15 & 16 2015 Regs: 16A
Deposit Plan Consultation	To enable anyone to make representations to the Council's Replacement Deposit LDP and consider any representations made on Deposit Plan	October 2023- December 2023	All representors within the RLDP database, including <ul style="list-style-type: none"> • Specific and General Consultation Bodies • Neighbouring Authorities • General Public • Hard to Reach Groups • Community Councils • Public Service Board 	<ul style="list-style-type: none"> • Email • Letter • Website • Social Media • Press Release • Workshops/ Meetings 	Hard copies of representations placed in Information Station and or Civic Centre and made available on the Council's website Updated Consultation Report	2005 Regs: 17, 18 & 19

Key Stage	Purpose	Consultation Period	Who will be involved	Method of engagement	Outcomes/ Reporting Method	LDP Regs ¹⁰
Integrated Sustainability Appraisal Report (IASR) and HRA Report Consultation	To enable anyone to make representations to the Council's ISAR and HRA Report and consider any representations made on ISAR and HRA reports	October 2023- December 2023	All representors within the RLDP database, including <ul style="list-style-type: none"> • Specific and General Consultation Bodies • SA/SEA Statutory Consultees • Neighbouring Authorities • General Public • Hard to Reach Groups • Community Councils • Public Service Board 	<ul style="list-style-type: none"> • Email • Letter • Website • Social Media • Press Release • Exhibitions/ Workshops/ Meetings 	<p>Hard copies of representations placed in Information Station and or Civic Centre and made available on the Council's website</p> <p>Updated Consultation Report</p>	2005 Regs: 17, 18 & 19

Table 4: Community Involvement timetable and proposed methods of engagement - Indicative Stages

Key Stage	Purpose	Anticipated Timescale	Who will be involved	Method of engagement	Outcomes/ Reporting Method	LDP Regs ¹⁰
Submission of RLDP to WG for examination	To enable examination of RLDP	May 2024	All representors within the RLDP database, including specific and general consultation bodes. Elected Members	<ul style="list-style-type: none"> • Email • Letter • Website • Copies of relevant supporting documents available at the Information Station and or Civic Centre and on the Council's website 	Submission to WG for examination	2005 Regs: 22 2015 Regs: 2 (17)

Key Stage	Purpose	Anticipated Timescale	Who will be involved	Method of engagement	Outcomes/ Reporting Method	LDP Regs ¹⁰
Independent Examination: <ul style="list-style-type: none"> • Notification of Independent Examination • Pre Examination Meeting • Consideration of all representation to the RLDP • MACs 	<ul style="list-style-type: none"> • To ensure that interested parties are aware that an Independent examination of the RLDP is taking place • To advise on examination procedure • To provide an impartial planning view on the soundness of the RLDP, and the representations made in respect of it 	June 2024 – September 2024	<ul style="list-style-type: none"> • All representors within the RLDP database, including specific and general consultation bodies. • Elected Members • All those interested parties that have made representations at the Deposit State of the RLDP. 	<ul style="list-style-type: none"> • Email/Letter • Notice placed on website • Round Table Discussions • Formal Hearing sessions (if requests and agreed by Inspector • Written submissions 	Statements of Common Ground and papers as necessary Inspectors Report	2005 Regs: 23
Publication of Inspector's Report <ul style="list-style-type: none"> • Inform interested parties of receipt and publication of Inspector's report 	To make the Inspector's Report of the examination of the RLDP publicly available	January 2025	All representors within the RLDP database, including <ul style="list-style-type: none"> • Specific and General Consultation Bodies • Neighbouring Authorities • General Public • Elected Members • Public Service Board 	<ul style="list-style-type: none"> • Council website • Formal notification by email/ letter • Press Release 	Binding Inspector's Report	2005 Regs: 24

Key Stage	Purpose	Anticipated Timescale	Who will be involved	Method of engagement	Outcomes/ Reporting Method	LDP Regs ¹⁰
Publication of Environmental Reports	Identifying any adjustments arising from the Examination	January 2025	All representors within the RLDP database, including <ul style="list-style-type: none"> • Specific and General Consultation Bodies • Neighbouring Authorities • General Public • Elected Members • SA/SEA statutory consultees • Public Service Board 	<ul style="list-style-type: none"> • Council website • Formal notification by email/ letter • Press Release 	Environmental Reports	2005 Regs: 25 2015 Regs: 2 (19)
Adoption of RLDP The adoption of the RLDP is to take place within 8 weeks of receipt of the Inspectors Report This will include publication of a ISA adoption statement	To inform stakeholders of adoption	February 2025	All representors within the RLDP database, including <ul style="list-style-type: none"> • Specific and General Consultation Bodies • Neighbouring Authorities • General Public • Elected Members • Public Service Board 	<ul style="list-style-type: none"> • Council website • Formal notification by email/ letter • Press Release 		2005 Regs: 25 2015 Regs: 2 (19)

Appendix A:

RLDP Consultation Bodies

Specific consultation bodies

(as defined in LDP Regulations 2, including UK Government Departments)

A1.1 The Council will consult the following specific consultation bodies at all stages in the preparation of the RLDP.

- Welsh Government (Planning Division will co-ordinate consultations)
- Natural Resources Wales
- Cadw
- Network Rail infrastructure Ltd
- Office of Secretary of State for Wales
- Telecommunication Operators – EE, Vodafone and 02, BT Virgin Media, Mobile Operators Association
- Aneurin Bevan Health Board
- Gas and Electricity Licensees – National Grid, Wales & West Utilities, Western Power Distribution, British Gas and SSE
- Sewerage and Water undertakers – Dwr Cymru/Welsh Water
- Department for Transport (including Secretary of State for functions previously exercised by the Strategic Rail Authority)
- UK Government Departments – Department of Business, Energy and Industrial Strategy
- Home Office
- Ministry of Defence

Neighbouring Local Authorities:

- Caerphilly County Borough Council
- Cardiff City Council
- Monmouthshire County Council
- Torfaen County Borough Council

Community Councils:

- Bishton Community Council
- Coedkernew Community Council
- Goldcliff Community Council
- Graig Community Council
- Langstone Community Council
- Llanvaches Community Council
- Llanwern Community Council
- Marshfield Community Council
- Michaelston-y-fedw Community Council
- Nash Community Council
- Penhow Community Council
- Redwick Community Council
- Rogerstone Community Council
- Wentlooge Community Council

General Consultation Bodies:

A 1.2. The Council will consult the following general consultation bodies, where appropriate, in accordance with the delivery agreement. The List is not exhaustive and may be added to as appropriate:

a) Voluntary Bodies whose activities benefit any part of the authority's area:

- Gwent Association of Voluntary Organisation
- Caerleon Civic Society
- Campaign for the Protection of Rural Wales, Newport and Valleys Branch
- Citizens Advice Bureau Newport City Council
- Duffryn Community Link
- Echo Stow Hill
- Friends of the Earth Cymru
- Gwent Ornithological Society

- Gwent Wildlife Trust
 - Fields in Trust
 - Newport Civic Society
 - Pentrepoeth Action Group
 - Planning Aid Wales
 - Severn Estuary Partnership
 - Sustrans
 - The Ramblers' Association
 - The Royal Society for the Protection of Birds
 - Always Community Association
 - Wildlife in Newport Group
 - Severn Area Rescue Association (SARA)
- b) **Bodies representing the interests of different racial, ethnic or national groups in the authority's area:**
- South East Wales Racial Equality Council
 - Gypsies and Travellers Wales
 - Travelling Ahead
 - The Gypsy Council
 - The National Federation Of Gypsy Liaison Groups
 - The Showmen's Guild Of Great Britain
 - Black Environment Network
 - Gwent Education Minority Ethnic Service
- c) **Bodies which represent the interest in different religious groups in the authority's area:**
- Churches in Newport
 - Community Connector Service – Faith Groups
- d) **Bodies which represent the interest of disabled persons in the authority's area:**
- Disability Wales
 - Newport Access Group
 - Guide Dogs for the Blind Organisation
 - Mind Cymru
 - Royal National Institute for Deaf People
 - Wales Council for Deaf People
 - Wales Council for the Blind
 - Sight Cymru
- e) **Bodies which represent the interest of people carrying out business in the authority's area:**
- Newport and Gwent Enterprise Agency
 - Business Wales
 - South East Wales Energy Agency
 - Business in the community
- Pobl
 - Linc Cymru
 - Newport City Homes
 - Coleg Gwent
 - University of South Wales
 - Farmers Union Wales
 - Federation of Master Builders
 - Home Builders Federation
 - Local Transport Operators
 - South And Mid Wales Chambers Of Commerce
 - Mineral Products Association
 - Confederation of British Industry (Wales)
 - Welsh ICE
- f) **Bodies which represent the interest of Welsh culture in the authority's area:**
- Glamorgan Gwent Archaeological Trust
 - Council For British Archaeology
 - Ancient Monument Society
 - Arts Council of Wales
 - National Museum of Wales
 - Newport Museum
 - Friends of Newport Ship
 - National Trust
 - National Roman Legion Museum
 - Royal Commission for Ancient Monuments
 - Stow Park Conservation Society
 - Celf Caerleon Arts
 - Green Caerleon
- g) **Bodies which represent the interest of difference age groups in the authority area:**
- Age Cymru
 - Newport Carers Forum
 - Newport Youth Council
 - Yr Urdd
- h) **Bodies which represent the interest of lesbian, gay, bisexual, and transgender groups in the authority's area:**
- Umbrella Cymru
 - Stonewall Cymru
- i) **Bodies which represent the interest of Welsh language in the authority's area:**
- Welsh Language Forum
 - Menter Iaith Caesnewydd

Other Consultees

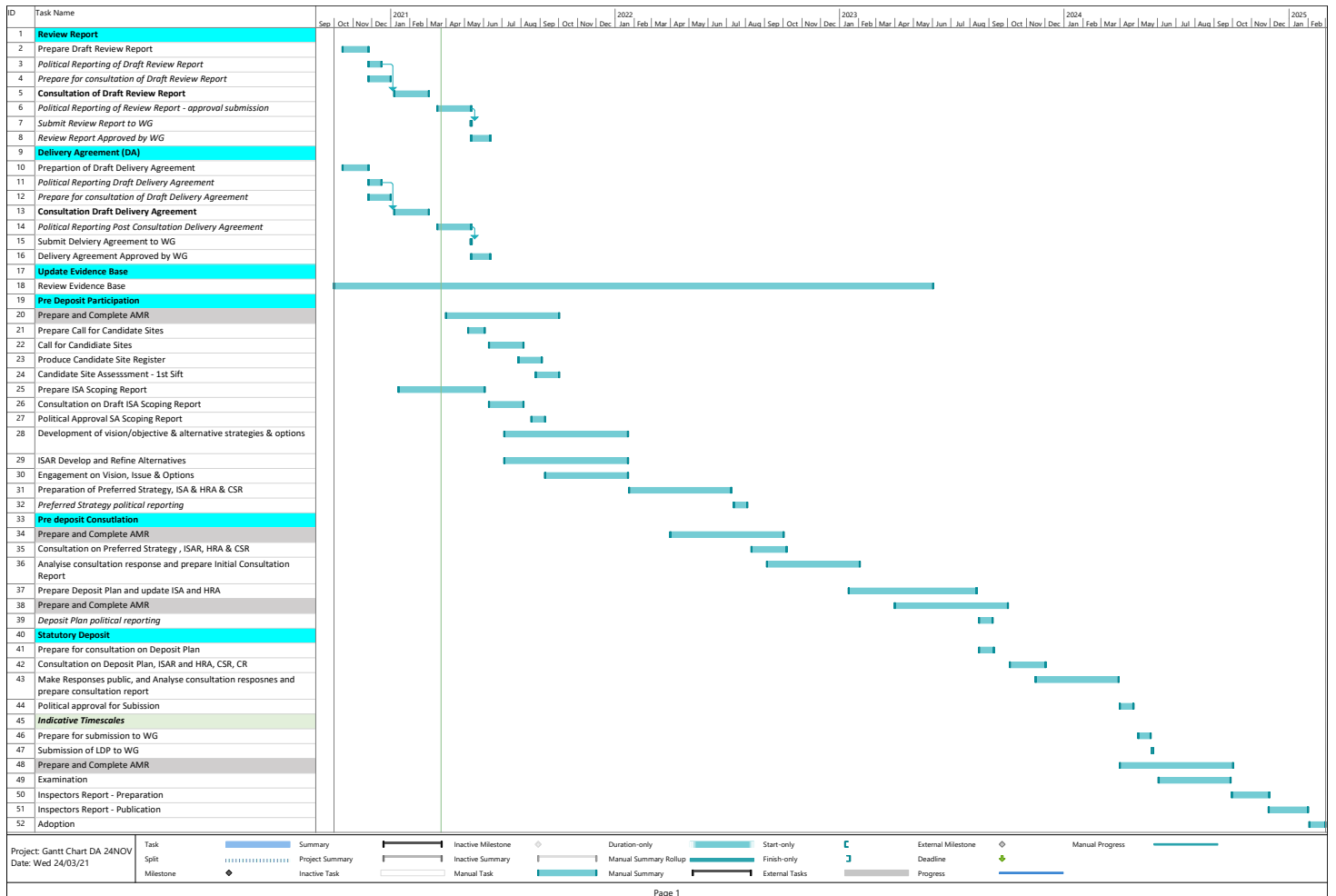
A 1.3. The Council will consult the following other consultees, where appropriate, in accordance with the Delivery agreement. This list is not exhaustive and may be added to as appropriate:

- British Horse Society
- Bus Users Cymru
- British Geological Survey
- Campaign for Real Ale
- Campaign for the Protection of Rural Wales
- Chartered Institute of Housing (Cymru)
- Chartered Management Institute (Cymru)
- Children's Commissioner for Wales
- Civil Aviation Authority
- Coed Cymru
- Community Transport Association
- Confederation of Passenger transport
- Crisis
- Crown Estate
- Design Commission for Wales
- District Valuer Services
- Fire and Rescue Service
- Future Generations Commissioner for Wales
- Logistics UK's
- Gwent Constabulary
- Heritage Amenity Societies, including The Victorian Society, The Georgian Group, Twentieth Century Social, CBA, Historic Gardens Trust.
- Institute of Civil Engineers
- Llamau
- National Farmers Union
- Newport's Citizen Panel
- Newport Harbour Commissioners
- Newport Housing Trust
- One Voice Wales
- Open Spaces Society
- Planning Inspectorate
- Public Health Wales
- Rail Freight Group
- Ramblers Cymru
- Road Haulage Association Ltd
- Royal Institute of Chartered Surveyors
- Royal Mail
- Royal Town Planning Institute Cymru
- RSPB Cymru
- Shelter Cymru
- Society for the Protection of Ancient Buildings
- South Wales Trunk Road Agency
- South Gwent Ramblers Association
- Sports Wales
- Stagecoach
- Sustrans Cymru
- The Energy Savings Trust
- The National Trust
- The National Library of Wales
- The Older Peoples Commissioner for Wales
- The Theatres Trust
- The Woodland Trust
- Transport for Wales
- Visit Wales (Welsh Tourist Board)
- Wales Council for Voluntary Action
- Welsh Language Commission
- WWF Cymru



Appendix B:

RLDP Timetable



Appendix C:

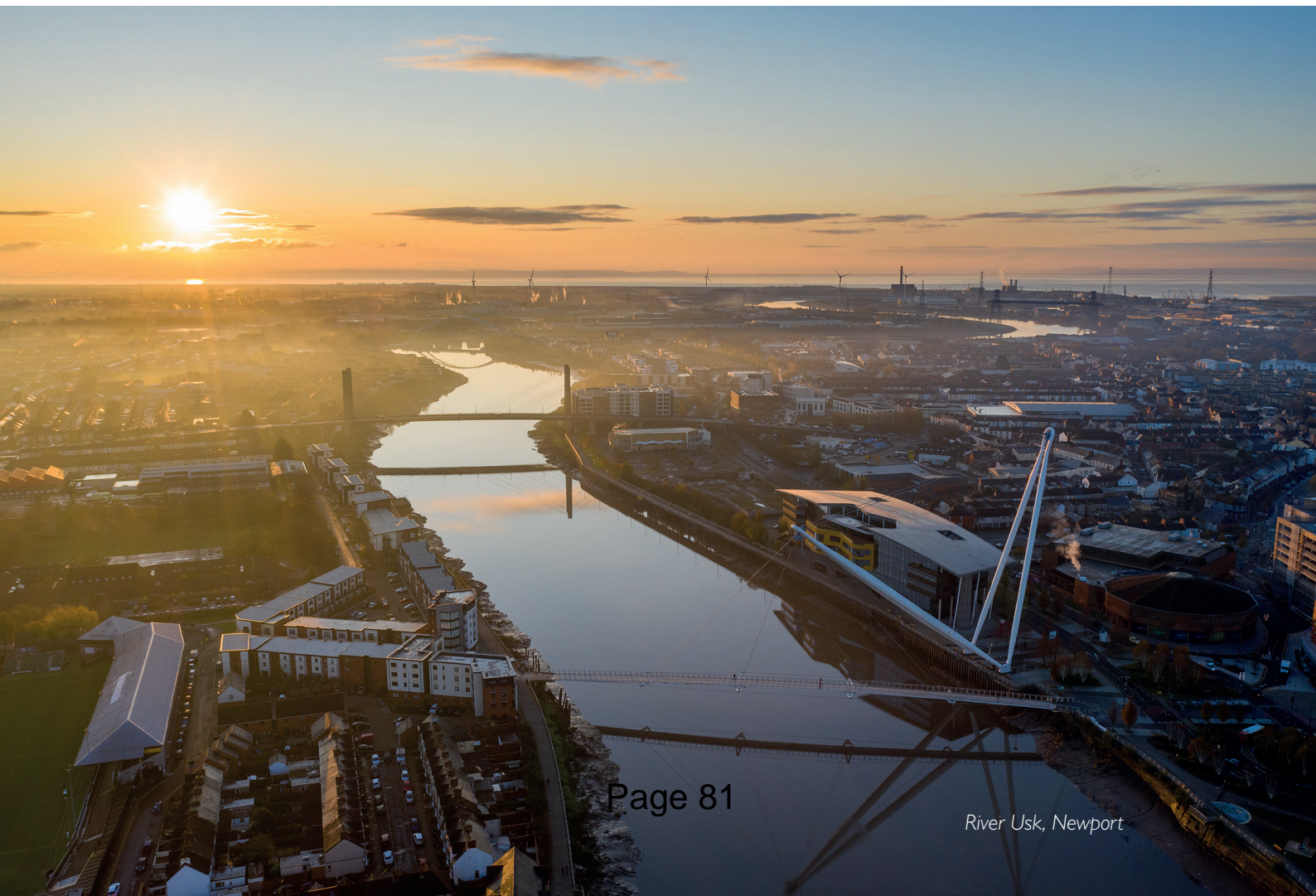
RLDP Risk Mangement

Issue	Potential Risk(s)	Mitigation	Probability / Impact
Council Issues			
Change in staff resources available to assist with RLDP preparation.	Programme Slippage	Ensure process maintains high level corporate priority and carry through staff recruitment and retention where necessary	Medium /High
Reduction and lack of financial resources.	Programme Slippage	Monitor Plan expenditure and ensure plan preparation is adequately costed.	Medium /High
Organisational restructuring	Programme Slippage	Ensure process maintains high level corporate priority	Medium/Medium
Council decision making structure/ political reporting cycle.	Programme Slippage	Timetable consulted on and special dates can be requested if required	Medium/Medium
Political Change/ Elections	Programme Slippage	Undertake early Member training	Medium/Medium
Lack of consensus throughout the organisation and/ or lack of support from officers/other departments in production of the evidence base.	Programme Slippage	Ensure organisation wide support of process at outset	Low/Medium

Issue	Potential Risk(s)	Mitigation	Probability / Impact
Local Issues			
Large volume and /or highly significant levels of objection to proposals e.g. site allocations.	Programme Slippage The next stage of the plan process cannot be undertaken without significant work	Ensure liaison with early involvement of stakeholders throughout the plan preparation process	Medium/Medium
Additional requirements arising from new legislation and/or national guidance. e.g. general conformity with the adopted NDF, alignment with revised Planning Policy Wales and LDP Manual, revised TAN15	Programme Slippage	Monitor emerging legislation and guidance and ensure involvement of progression of such work.	Medium /High
Insufficient information to undertake ISA/SEA.	Programme Slippage	Identify and manage expectation of consultation bodies. Consider additional resourcing	Medium/Medium
Impact from ISA /HRA	Programme Slippage	Ensure the processes are fully integrated with plan preparation process	Low/Low
Legal Challenge.	Programme Slippage. Plan quashed.	Ensure correct procedures followed, consistency with WG guidance and creation of sound evidence base	Low/Medium



Issue	Potential Risk(s)	Mitigation	Probability / Impact
Regional and National Issues			
Direction from Welsh Government Cabinet Secretary to prepare a Joint Plan.	Plan preparation would halt and a new plan process begun from the start	None, the Council would be expected to engage with the WG if such an event occurred	Medium/High
Ability of statutory consultees and/or Planning Inspectorate to respond within set timescales.	Programme Slippage Delay of examination and/ or Inspectors Report.	Maintain liaison with statutory consultees and the Planning Inspectorate to ensure identification of potential problems.	Low/Medium
Plan fails the test of 'soundness'.	Plan cannot be adopted without additional work. This could lead to part of plan being excluded or change or withdrawal of the plan.	Ensure robust evidence base, ISA and HRA correctly carried out, and appropriate procedures followed and documented.	Low/High



Appendix D:

Glossary

AMR	Annual Monitoring Report
BME	Black and Minority Ethnic
CCR	Cardiff Capital Region
DA	Delivery Agreement
PCPA	Planning and Compulsory Purchase Act
LDP	Local Development Plan
RLDP	Replacement Local Development Plan
NDF	National Development Framework
ONS	Office For National Statistics
PPW	Planning Policy Wales
PSB	Public Service Board
ISA	Intergrated Sustainability Appraisal
SAC	Special Area for Conservation
SEWSPG	South East Wales Strategic Planning Group
TAN	Technical Advice Note
WG	Welsh Government

Newport Local Development Plan Review Report

April 2021



Creu Lleoedd Cymru
Placemaking Wales

Llofnodydd y Starter Charter Signatory

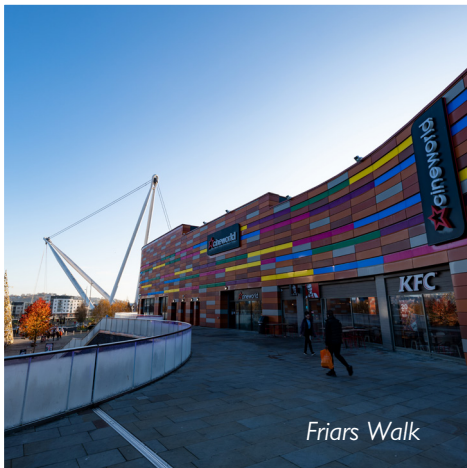
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NEWPORT
CITY COUNCIL
CYNGOR DINAS
CASNEWYDD

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Friars Walk



I. Executive Summary

■ Purpose of the Review Report

- I.1 Local Planning Authorities (LPA) have a requirement to keep their development plans up to date and consider the need for review either through their Annual Monitoring Report (AMR) or having reached 4 years post adoption of the Local Development Plan (LDP). The Newport AMR 2020 made a recommendation, and the Council has subsequently agreed, to begin the review and process of undertaking a replacement LDP.
- I.2 Changes to an adopted LDP can only be made through formal plan revision. The first stage is to produce a Review Report (RR), which will be a key part of the evidence base underpinning the form and content of the revised plan and submitted to the Inspector for examination. There are two revision routes available to choose from when looking how to revise an LDP. Firstly there is a Full Revision of the plan following the same procedures as used in preparing the adopted plan, or secondly, the Short Form Revision procedure where the parameters to be considered are very much more focussed and limited in scope, as evidenced through the RR.
- I.3 The importance of this Review Report to the LDP process means that it is essential that it is subject to consultation. This will ensure that it forms a thorough and robust approach to the creation of a Replacement LDP for Newport. Following consultation, the report will be updated reflecting the comments received setting out the potential implications for both

the content of the plan and the review process i.e. full plan revision or short form revision.

■ Consultation

- I.4 The Council undertook consultation on the draft Delivery Agreement from January to 5 March 2021. Views were sought on the issues that should be considered in the full review of the LDP, together with the subsequent potential changes required to the LDP, as set out in Chapters 5 and 6 of this report.
- I.5 Please note that if you or your organisation are not already registered to be involved, you can do this through the Council's website: www.newport.gov.uk/ldp, by email to ldp.consultation@newport.gov.uk, by telephoning 01633 656656 or by writing to: Planning Policy Team, Room 707, Newport City Council, Civic Centre, Newport, NP20 4UR.



2. Introduction

- 2.1 The Newport Local Development Plan (LDP) was adopted by the Council on 27 January 2015 and sets out the Council's planning framework for the development and use of land in Newport over the period 2011 – 2026. In accordance with statutory requirements, the LDP has been monitored on an annual basis with five Annual Monitoring Reports (AMR) published to date¹.
- 2.2 To ensure that LDPs are kept up-to-date, local planning authorities are required² to commence a review of their plans at least once every four years following plan adoption, or sooner if the findings of the AMRs indicate significant concerns with a plan's implementation. This Review Report (RR) sets out the finding of the review³, setting out the proposed extent of likely changes to the existing LDP and seeks to confirm the revision procedure to be followed in preparing a replacement LDP (RLDP).
- 2.3 The Review Report is structured as recommended in national guidance and contains the following sections:
- 2.4 Chapter 3 details the key legislative, national and local policy changes and evidence base that have occurred since the adoption of the LDP in 2015 which are important considerations to inform the review of the LDP.
- 2.5 Chapter 4 provides a summary of the main findings of the past five Annual Monitoring Reports (AMR), outlining the associated implications for review of the LDP.
- 2.6 Chapter 5 provides an assessment of the current LDP and sets out the potential changes in terms of the Vision and Objectives, Development Strategy and Policies to inform the review process.
- 2.7 Chapter 6 considers the areas of evidence base that would need to be reviewed/updated in preparing a RLDP.
- 2.8 Chapter 7 considers the potential options for review of the LDP and opportunities for collaboration.
- 2.9 Chapter 8 provides a conclusion on the appropriate form of plan revision and outlines the next steps.

¹Available to view at: <http://www.newport.gov.uk/en/Planning-Housing/Planning/Planning-policy/Local-Development-Plan/LDP-monitoring-reports.aspx>

²Town and Country Planning (LDP) (Wales) Regulations 2005, as amended: S.41

³Required under Section 69 of The Planning and Compulsory Purchase Act 2004

3. Informing the LDP Review

3.1. The Council must consider contextual changes since the adoption of the LDP. This includes changes to national, regional, and local policies, legislation and strategies that will have implications for the RLDP. The most significant of these changes are set out below.

■ Legislative Changes

Planning (Wales) Act 2015

3.2 The Planning (Wales) Act received Royal Assent in July 2015 and came into force in stages between October 2015 and January 2016. It sets out a series of legislative changes to deliver reform of the planning system in Wales, to ensure that it is fair, resilient and enables development. The Act addresses 5 key objectives which includes strengthening the plan-led approach to planning. The Act strengthens the plan led approach and introduces a legal basis for the preparation of a National Development Framework (NDF) and Strategic Development Plans (SDP).

3.3 It is a statutory requirement for Welsh Ministers to produce a National Development Framework. The NDF, renamed Future Wales: the National Plan 2040, will replace the Wales Spatial Plan and will set out land use priorities and a land use framework, concentrating at the nationally significant scale, for Strategic and Local Development Plans. The NDF has been laid in the Senedd and is undergoing a scrutiny period and is anticipated to be published in February 2021; how this impacts on Newport is set out below.

3.4 The key impact on Local Development Plans from the introduction of NDF and SDP is the need to consider a review of the LDP once the NDF and SDP are published or adopted to ensure all land use plans are consistent.

The Town and Country Planning (Local Development Plan) (Wales) (Amendment) Regulations 2015

3.5 Amendments to The Town and Country Planning (Local Development Plan) (Wales) Regulations 2005 were carried out in response to the outcome of the LDP refinement exercise and aims to simplify certain aspects of the LDP process. The amended Regulations remove the statutory requirement to advertise consultation stages in the local press; allowing local planning authorities to make revisions to the LDP where the issues involved are not of sufficient significance to warrant the full procedure, without going through the full revision process; eliminate the need to call for, and consult on, alternative sites following the deposit consultation; and make minor and consequential amendments.

3.6 The amended LDP Regulations came into force on 28 August 2015 and together with the related policy and guidance in Planning Policy Wales (PPW). Edition 10, and the revised LDP Manual (Edition 3), aim to make the LDP process more efficient and effective (i.e. enabling swifter plan preparation and revision without imposing unnecessary prescription). The amended Regulations will need to be considered in relation to any Plan review and will be given further consideration as necessary.

Well-being of Future Generations (Wales) Act 2015

3.7 The Act is about putting sustainable development at the heart of Government and public bodies. This is to be achieved by improving the social, economic, environmental and cultural well-being of Wales. The Act requires public bodies to consider the long-term, to work with people and communities and each other, look to prevent problems and take a more joined-up approach; through the application of seven well-being goals. Newport has produced its Local Well-being Plan as required which has replaced the Single Integrated Plan (SIP). This Act will require LDPs to consider the outcome of the Well-being Plan in the future rather than the SIP which is currently given regard. Sustainability is a core principle of the LDP and there will be clear links between the LDP and Well-being Plan.

Environment (Wales) Act 2016

3.8 The Environment (Wales) Act received Royal Assent in March 2016 and sits alongside both the Planning (Wales) Act 2015 and the Well-being of Future Generations (Wales) Act 2015 in promoting the sustainable use, management, and development of Welsh resources. The Environment (Wales) Act introduces new legislation for the environment and provides an iterative framework which ensures that managing Wales' natural resources sustainably will be a core consideration in decision-making. The Act also requires Welsh Government to produce a Natural Resources Policy that sets out the priorities, risks, and opportunities for managing Wales' natural resources sustainably, as detailed below.

Historic Environment (Wales) Act 2016

3.9 The Historic Environment (Wales) Act 2016 received Royal Assent in March 2016. The Act has three main aims: to give more effective protection to listed buildings and scheduled monuments; improve the sustainable management of the historic environment; and introduce greater transparency and accountability into decisions taken on the historic environment. The Act provides effective protection to listed buildings and

scheduled ancient monuments; it improves the sustainable management of the historic environment and introduces greater transparency and accountability into decisions taken on the historic environment. The Act will also form the core of an integrated suite of legislation, policy, advice and guidance which together will provide a flexible and effective system for the sustainable management of the Welsh historic environment, reflecting current conservation principles and practice. The LDP sets out locally specific policies and has not sought to repeat national policy and will ensure that any changes to conservation practice are reflected where necessary in a replacement plan.

Public Health (Wales) Act 2017

3.10 The Public Health (Wales) Act 2017 received Royal Assent in July 2017. The Act makes changes to the law in Wales to improve health and prevent avoidable health harms. Some of the relevant changes in the Act include the production of a national strategy on preventing and reducing obesity and a requirement to undertake Health Impact Assessment (HIA) on key decisions including Local Development Plans shall be undertaken part of the Sustainability Appraisal.



■ National Planning Policy/ Plans

National Development Framework

3.11 The Welsh Government has published Future Wales: the national plan 2040 (FW) which is the highest tier of development plan in Wales. FW, legally known as the National Development Framework (NDF), sets out the 20-year spatial framework for land use in Wales, providing a context for the provision of new infrastructure/growth. It will concentrate on development and land use issues of national significance which the planning system is able to influence and deliver. FW replaces the Wales Spatial Plan which was revoked on the 24th February 2021.

3.12 FW identifies Newport as a National Growth Area. The Policy 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 region. It goes on to state that Strategic and Local Development Plans across the region should recognise Newport as a focus for strategic housing and economic growth; essential services and facilities; advanced manufacturing; transport and digital infrastructure; and consider how they can support and benefit from Newport's increased strategic regional role. 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. The inclusion of Newport as a Centre of National Growth is a significant boost for the city.

Welsh National Marine Plan

3.13 The Welsh National Marine Plan (WNMP) was adopted on 12 November 2019. It is the first marine plan for Welsh seas and covers the inshore and offshore marine plan areas for which Welsh Ministers are the marine planning authority. The WNMP sets out the Welsh Minister's policies for the sustainable development of Wales' seas. The Plan will help manage increasing demands for the use of our marine environment, encourage and support the economic development of

marine sectors at appropriate locations and incorporate environmental protection and social considerations into marine decision-making. Due to Newport's coastal location, the next version of the LDP will need to fully consider the adopted WNMP.

Planning Policy Wales (Edition 11) and Technical Advice Notes

3.14 Since the LDP was adopted in January 2016, Welsh Government have revised Planning Policy Wales four times; the current version is Edition 11 which was published in February 2021. PPW was redrafted so that the implications of the publication of Future Wales: the national plan 2040 is fully integrated into policy. This reiterates the concept and importance of placemaking into the heart of national planning policy in order to ensure that planning decisions consider all aspects of well-being and deliver new development which is sustainable and provides for the needs of all people

3.15 Since the adoption of the LDP, the following changes have been made to TAN and Mineral Technical Advice Notes (MTAN) in Wales:

- TAN 1: Joint Housing Land Availability Studies was revoked by WG in March 2020.
- TAN 4: Retail and Commercial Development was updated in November 2016.
- TAN 8: Planning for Renewable Energy was revoked by WG in February 2021.
- TAN 11: Noise. There was a call for evidence made in early 2020 to support the review of the TAN to include air quality and soundscape. Clean Air Plan for Wales - Healthy Air, Healthy Wales.
- TAN 12: Design was updated in March 2016.
- TAN 14: Coastal Planning was recently updated, and consultation responses are being reviewed.
- TAN 15: Development and Flood Risk consultation was recently updated, and consultation responses are being reviewed.
- TAN 20: Planning and the Welsh Language updated in October 2017.
- TAN 21: Waste updated in February 2017.
- TAN 24: The Historic Environment was produced in May 2017.
- Current work is being undertaken on reviewing intensive agriculture.

Local Development Plan Manual, Edition 3

3.16 The Development Plans Manual, Edition 3, was published on 26 March 2020. The Manual is a reference document for practitioners who are responsible for, or contribute to, the preparation and implementation of development plans. It contains practical guidance on how to prepare, monitor and revise a development plan, underpinned by robust evidence to ensure that plans are effective and deliverable and contribute to place-making, as defined in national policy set out in PPW. The Manual incorporates lessons learned to date, best practice in resolving issues and how to 'de-risk' plans through the preparation of a robust and focussed evidence base. The Manual clarifies the expectations of Welsh Government about the plan making process. This will be one of the key reference documents for the progression of a revised LDP.

Natural Resources Policy

3.17 In line with the Environment (Wales) Act 2015 the Welsh Government produced a Natural Resources Policy (NRP) in August 2017. The focus of the NRP is the sustainable management of Wales' natural resources, to maximise their contribution to achieving goals within the Well-being of Future Generations Act. The NRP sets out three National Priorities: delivering nature-based solutions, increasing renewable energy and resource efficiency, and taking a place-based approach. The NRP also sets the context for Area Statements (AS), which have been produced by Natural Resources Wales (NRW) (see below), ensuring that the national priorities for sustainable management of natural resources inform the approach to local delivery. Local Planning Authorities must have regard to the relevant Area Statement in Local Development Plans.

The National Strategy for Flood and Coastal Erosion Risk Management in Wales

3.18 In line with the Flood and Water Management Act (2010), Welsh Government has produced its second national strategy on flood and coastal erosion risk management (FCERM)

(October 2020). The strategy sets out how the Government intend to manage the risk and sets objectives and measures of all partners, including NCC, for the next ten years. A replacement LDP will need to recognise the risk and provide a policy framework which looks to prevent exposure to risk which will be informed by the anticipated Wales Flood Map.

Wales Transport Strategy

3.19 The WG have recently begun consultation for a new Wales transport strategy: a vision for transport in Wales (November 2020). The overarching vision for the strategy is to achieve 'An accessible, sustainable transport system'. The WTS is a statutory document required by the Transport (Wales) Act 2006 (The Act). The strategy covers all modes of transport, setting out the government's strategic priorities and desired outcomes, providing a link to wider priorities as well as plans at the local authority level. The development of this strategy will have a clear impact on a replacement LDP.

■ Regional Context

Strategic Development Plans (SDP)

3.20 The aim for the SDP is to address regional factors such as housing, employment and transport across the region. It is anticipated that Newport will be part of an SDP area which shall be in alignment with the emerging Cardiff Capital Region (CCR) City Deal proposals. LDPs will continue to have a fundamental role in the plan led system. The Welsh Government are currently consulting on the regulations for the establishment of Corporate Joint Committees (CJC) as well as the subordinate legislation for the procedure to produce SDPs in Wales. The CJC will be responsible for delivering strategic planning and therefore it is expected progress on the South East Wales Strategic Development Plan will occur post consultation in 2021.

3.21 The UK Government has agreed to a 1.2bn City Deal for the Cardiff Capital Region in partnership with the Welsh Government and ten Local Authorities, including Newport City Council. As set out in the report 'Powering the Welsh Economy', the Cardiff Capital Region is intended to encourage the ten local authorities and other key partners in its boundaries to work together and collaborate on projects and plans for the area. This includes investment in the regions infrastructure, creation of a non-statutory Regional Transport Authority, development of capabilities in compound semiconductor applications, creation of Skills and Employment Board, future employment support, Regional Business Organisation and commitment to a partnership approach to housing and regeneration. The authorities forming the Capital Region are continuing to work on a City Deal bid to fund projects aimed at boosting the competitiveness of the region over the next 20 years. The progression of the Cardiff Capital Region agenda, City Deal Bid and any subsequent implications for the LDP will be given further consideration.

Western Gateway

3.22 The Western Gateway is a recently established strategic partnership that aims to deliver an economic powerhouse that will drive growth on both sides of the Severn. As an equal partner, Newport is expected to be a key player in the success of the Western Gateway and capitalise on the benefits of greater collaboration. In November 2019, the Western Gateway was formally launched as a strategic partnership promoting and maximising economic growth across South Wales and the West of England to create jobs, boost prosperity and support the universities and businesses of the region.

3.23 The strengths associated with working in partnership with authorities in the Western Gateway will need to be fully capitalised on with the creation of the RLDP.

3.24 Natural Resources Wales is required to prepare Area Statements (AS) under section 11 of the Environment (Wales) Act, 2016. These Area Statements are developed to help facilitate the implementation of the National Natural Resources Policy (NRP) and build on the evidence set out in the State of Natural Resources Report (SoNNAR). The South East Wales Area Statement (SEWAS) was published on 1 April 2020. It has taken a landscape scale approach considering where and why we want to build ecosystem resilience in terms of the special and distinctive landscape areas of South East Wales. The SEWAS has been produced to inform planning and helps stakeholders consider different ways of working together to meet the four strategic themes:

1. **Linking our landscapes** – identifying local opportunities for protected sites, natural and built environments to contribute towards resilience of wider priority habitat networks in the region.
2. **Climate Ready Gwent** – identifying landscape and regional scale opportunities and collective interventions for climate adaptation and mitigation which enhance local ecosystems and community resilience.
3. **Healthy Active Connected** – identifying opportunities and collaborative interventions that protect and improve health and wellbeing.
4. **Ways of Working** – identifying the benefits of strategic regional collaboration and identifying that we need to do at a regional scale to maximise local delivery and natural resource benefits.

3.25 The replacement Local Development Plan is required to have regard to and be consistent with this SEWAS and this will be judged against a test of soundness at examination.

■ Neighbouring LPAs

- 3.26 Considering the exceptional circumstances being experienced through the Covid-19 pandemic, progressing an LDP in line with agreed Delivery Agreements has been a challenge. Technical work has been progressed by LPAs, but a revised Delivery Agreement is required to agree a new way forward for RLDP preparation. The stage to which our neighbouring authorities reached pre Covid-19 is set out below.
- 3.27 **Cardiff City Council** adopted their LDP on 28 January 2016. The LDP has a plan period of 2006-2026. Following the fourth year of adoption the Council began the review of the LDP. The Review Report and Delivery Agreement were put out for public consultation in early 2020 but due to the impact of Covid-19, both are in the process of being updated and consultation ended in February 2021.
- 3.28 **Caerphilly County Borough Council** adopted their LDP on 23 November 2010. The LDP has a plan period of 2006-2021. Following consideration of the second AMR (2013) the Council resolved to commence work on the Review of the LDP. The deposit Replacement LDP occurred early 2016 but on 11 October 2016, following receipt of objections from Welsh Government, the Council resolved to withdraw the RLDP. On 23 October 2019 the Council agreed to commence work on a full revision of the adopted LDP and have produced a new draft review report. The updated Delivery Agreement (reflecting the Covid situation) is currently out for consultation due to end 29 March 2021. The Council is also out for a call for Candidate sites which ends 31 August 2021.
- 3.29 **Torfaen County Borough Council** adopted their LDP in December 2013. The LDP covers the period 2013-2021. Torfaen Council resolved to review the LDP in 2017. Work on the RLDP began on 10 March 2020 following approval of their DA. The Council are currently out for consultation on their Preferred Strategy which is due to end on 26 March 2021.

- 3.30 **Monmouthshire County Council** adopted their LDP on 14 February 2014. The LDP has a plan period of 2011-2021. Monmouthshire Council resolved to review the LDP in 2017. Work on the RLDP began on 14 May 2018 following the approval of their DA from WG; the plan period for the RLDP is 2018-2033. The publication of the WG population and household projections have meant that the Council has had to revisit both the Growth and Spatial Options and Preferred Strategy stages of the RLDP process. An updated DA has been agreed by Welsh Government in October this year and work will progress in line with this new timetable.

■ Local Context

2018 Based Population and Household Projections

- 3.31 The Office for National Statistics published the 2018-based local authority population projections on 27 February 2020. These were subsequently republished on 11 June 2020 revising an error discovered in the February data release. The projections provide an indication of the possible size and age structure of the population in the future for local authorities in Wales for the period 2018 to 2043. Newport has the highest projected increase in population of 5.1% over these years. Similarly, the 2018-based local authority household projections were published on 27 February 2020. The projections provide an indication of the future number of households and their composition in Wales. Again, Newport has the largest increase in households by 6.9%. These projections will form the basis of analysis for a revised LDP for Newport.

Newport Local Well-Being Plan

- 3.32 Under the provisions of the Well-Being for Future Generations Act, a Public Service Board (PSB) must be set up for each Local Authority in Wales. Newport established the One Newport PSB, and this partnership published the Local Well-Being Plan for Newport⁴ on 1 May 2018.

⁴ <http://www.newport.gov.uk/documents/One-Newport-Local-Well-Being-Plan-2018-23-English-Final.pdf>

3.33 The Well-Being Plan sets out the PSBs priorities and actions for the period 2018-2023. Firstly, the Plan takes the seven Well-Being goals and has set out thirteen priorities. Four well-being objectives have then been developed to deliver against the Well-Being goals and priorities; these are:

- 1) People feel good about living, working, visiting, and investing in Newport
- 2) People have skills and opportunities to find suitable work and contribute to sustainable economic growth
- 3) People and communities are friendly, confident, and empowered to improve their well-being
- 4) Newport has healthy, safe, and resilient environments

3.34 Finally, five integrated interventions have been agreed to ensure the priorities were tackled in a targeted and focussed manner. The five interventions all have some direct or indirect influence over the development plan process; they are:

- **The Newport “Offer”** – the complete package of a desirable city to live and work.
- **Strong Resilient Communities** – taking a preventative place-based approach.
- **Right Skills- Access** - to skills and education that align with employment opportunities.
- **Green and Safe Spaces** –greener, healthier, and safer place with equal access to quality space.
- **Sustainable Travel** – efficient, safe, and accessible transport with low impact on environment.

3.35 There has been annual reporting on the Newport Well-Being Plan since its publication and a review is currently being undertaken. There is a requirement for a Well-Being Plan to be published no later than one year after the date of each ordinary election to the local authority, which is May 2022. The work for the next well-being plan will overlap with the development of the RLDP and a collaborative relationship between the two processes will be maintained. This will ensure that the RLDP has had regard to the Well-Being Plan as they are both developed. The Well-Being Plan is recognised as a fundamental part of the evidence base for development plans as set out in Planning Policy Wales.

Corporate Plan

3.36 The Newport Corporate Plan (2017-2022) sets out how the Council will build on successes and Build a Better Newport. The plan sets out how this will be done by focusing on jobs and the economy, education and skills, fairness and equality, community safety and cohesion, the environment, transport, culture, and social well-being. The four commitments set out in the plan, Resilient Communities, Thriving City, Aspirational People and Modernised Council, each have aspects that will influence and direct the focus of a RLDP. This impact from the plan can be seen in land use terms through focussing on achieving Council asset transfers, meeting the city’s dementia friendly status, focusing on increased SME development in the City, dealing with parking problems, new waste facilities, improved or new education and skill facilities, meeting social care capacity requirements and delivering neighbourhood service hubs.

3.37 The corporate plan is supplemented by three relevant corporate strategies – Digital Strategy, Strategic Equality Plan and Welsh Language Strategy. The Digital Strategy (2015-2020), currently under review, sets out how the Council will enable connectivity and increase access to service. The focus is for Newport to become a digital city which empowers its citizens, customers, and business through the innovative use of digital services. The Strategic Equalities Plan (2020-2024) will be an integral piece of information for the Integrated Assessment work undertaken for a RLDP. The Welsh Language Strategy (2017-2022) sets out a vision that ‘the people of Newport can use Welsh in all parts of life’. The RLDP will take the aims of this strategy into account when undertaking its language impact assessment, and when engaging on plan preparation, as well as the direct land use implications e.g. provision of welsh language schools.

3.38 The Council has recently signed up to the **Placemaking Wales Charter**; by signing up to the Wales Placemaking Charter the Council pledges to:

- Involve the local community in the development of proposals
- Choose sustainable locations for new development

- Prioritise walking, cycling and public transport
- Create well defined, safe, and welcoming streets and public spaces
- Promote a sustainable mix of uses to make places vibrant
- Value and respect the positive distinctive qualities and identity of existing places.

3.39 In addition, the Council has also signed up to the **Healthy Travel Charter** for Gwent. This charter commits those twenty-one leading public sector organisations in Gwent to support and encourage staff to travel in a sustainable way to and from work. Through 15 ambitious commitments, the charter promotes walking, cycling, agile working and the use of public transport and ultra-low emission vehicles. The aim is to increase sustainable journeys made to and from workplaces, reducing the impact on the environment and improving health in Gwent for current and future generations.

Other Council Plans and Strategies

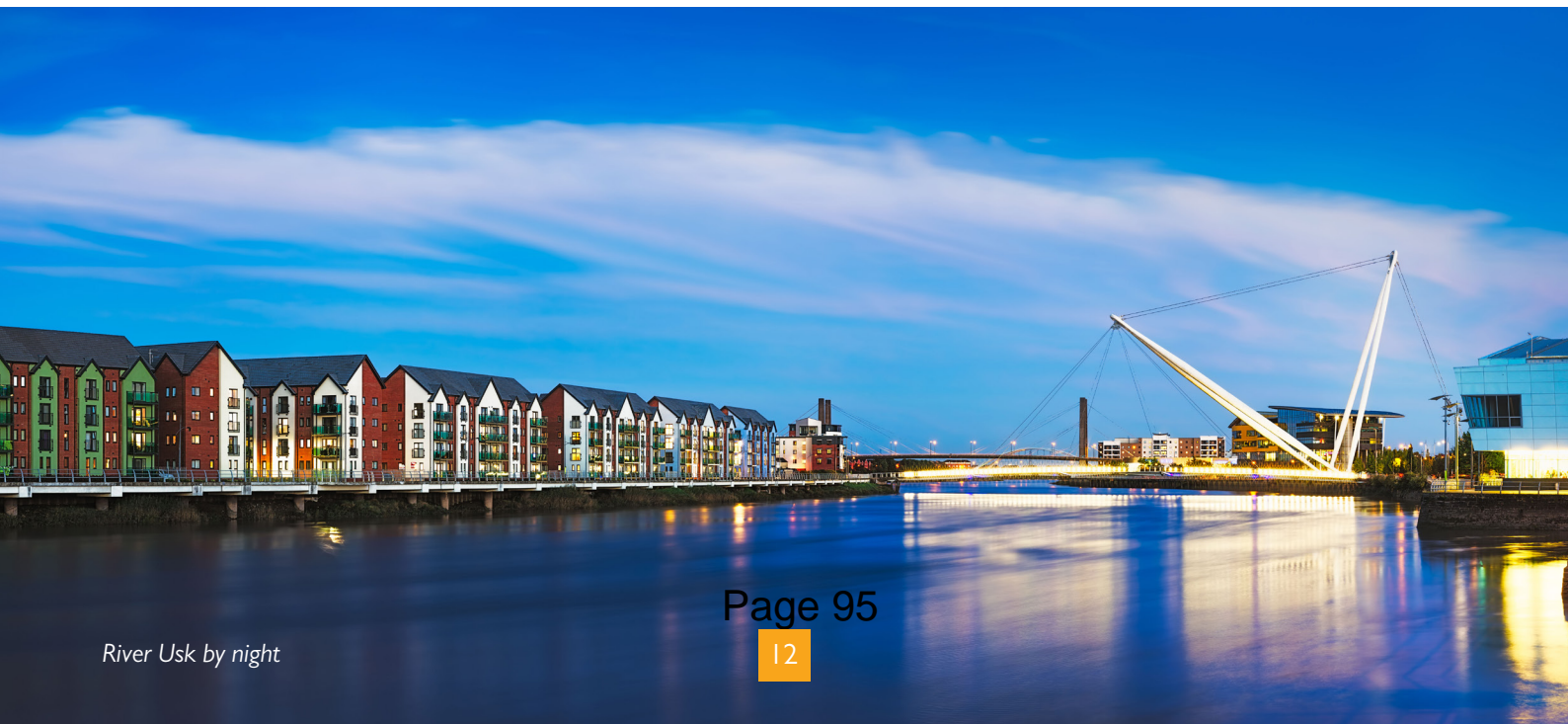
3.40 The national and regional context has seen much change, and this is reflected within the Council's own work programme. There are several relevant plans and strategies created since the adoption of the LDP which will provide an updated or new approach to local matters. A summary of the most relevant plans and strategies is set out below:

3.41 The Newport Economic Growth Strategy

(EGS) adopted in 2015, commits to a ten-year vision and framework for building Newport's economy. Since 2015, Newport has become a more competitive city with a growing influence in high value sectors. We have developed a multitude of training and development routes for future workers and the City is experiencing a rapidly expanding tourism sector. Newport now has a pivotal role in the success of both the Cardiff Capital Region and Western Gateway Partnerships and as an organisation we are embracing new ways of working. The Economic Growth Strategy, refreshed in February 2020, was updated to ensure that Newport is maximising opportunities to enable and facilitate growth as well as complimenting the ongoing physical regeneration of the City. A recovery addendum (2020) for the EGS was produced by the Council in June 2020 to set out how the Council will support the city's economic stability and growth in the wake of the coronavirus pandemic.

3.42 The **Newport City Centre Masterplan (2019 – 2029)** sets out the Council's strategic framework for city centre regeneration. This was updated in 2019 to reflect the progress made to date and a new vision and set of priority projects was been approved.

3.43 The requirements of the **Active Travel Act 2013** have meant the Council has undertaken a series of existing and integrated Route Maps; this will provide a new evidence base for RLDP work on sustainable travel matters. There is a clear role set out for the planning system



to facilitate active travel, and the RLDP will need to consider the outputs of the legislative requirements of the act. This national action plan sets out the Welsh Government vision and how this cultural shift towards prioritising active travel is undertaken e.g. through developments, planning policy, planning obligations etc.

3.44 **The Waste Strategy for Newport (2019-2025)** was adopted in February 2020 and this sets out the objectives, action plans and monitoring programme to ensure all elements linked to improved recycling are strategically driven and robustly monitored. A land use based action includes the provision of new facilities such as Household Waste Recycling centres.

3.45 **The Biodiversity and Resilience of Ecosystems Duty Report 2019** is a requirement of the Environment (Wales) Act 2016 and it outlines how the organisation has addressed its biodiversity duty and consequently achieves its Well-being objectives and Nature Recovery Plan objectives. The report shows a positive approach and highlights those projects and ambitions for future working that can provide evidence and relevant input to a new RLDP. An aim of the Council, and PSB, is to develop a Newport-wide Green Infrastructure Plan. Such a plan and the evidence behind it will be a key informative for a replacement LDP and satisfy the requirement of Planning Policy Wales for such an assessment.

3.46 Newport has 11 **Air Quality Management Areas (AQMA)** and since the LDP was adopted an SPG has been developed to ensure that air quality impacts are adequately dealt with through the planning application regime. The work being undertaken by WG on revising Technical Advice Note 7 and the new development allocations within a RLDP means that the plan will need to consider the impact on air quality at the strategic scale. An Air Quality Action Plan will be developed by the Council and work related to this will inform a RLDP. The recent publication of the **Clean Air Plan for Wales: Healthy Air, Healthy Wales (2020)** clearly establishes this topic as a concern. A RLDP will consider its impact and the role planning can take in assisting in tackling the causes of poor air quality.

3.47 Flood risk is a key concern for the Newport area, and one type of water management that the planning system can influence is the **Sustainable Drainage (SuD)** solution for new developments. The Flood and Water Management Act (2010) established the creation of **Sustainable Drainage Approval Body (SAB)** in local authorities. The legislation gives those bodies statutory responsibility for approving and in specified circumstances, adopting the approved drainage systems. From 7 January 2019, all new developments of more than 1 dwelling house or where the construction area is more than 100m², require SuDs for surface water. From this date onwards, SuDs on new developments must be designed and built in accordance with Statutory SuDs Standards and must be approved by the local authority SAB before construction work begins. This clearly has an impact on development requirements and future flood assessment work undertaken for the RLDP.

3.48 **Newport Destination Management Strategy and Action Plan** recognises Newport's strengths and addresses Newport's weaknesses as a destination, identifying key actions needed to improve the visitor experience, as well as on-going actions which underpin this. Tourism is vital to Newport's economy, which has seen a transformational shift in jobs from heavy industry and manufacturing to jobs in the public sector and service industries, of which tourism is a crucial sector representing about 5 % of the total workforce. The importance of sports and tourism and events to Newport continues to increase with the draw of the Newport International Sports Village, National Velodrome, improved Rodney Parade facilities, the International Convention Centre, and the Ryder Cup venue at the Celtic Manor. The importance of such events was clearly set out in the adopted LDP strategy.

■ Covid-19 Pandemic

3.49 The Covid-19 health emergency has posed significant and unprecedented challenge and the long-term impact on businesses and societal norms is still not clear. The role of planning to aid any economic and social



recovery will need to be considered in the evidence base for any replacement LDP. Of note is the fact that the Coronavirus pandemic has had a massive impact on the way people work, travel, use open green space etc. It has also had an impact on terms of the reduction in the delivery rates of dwellings, and development in general, and we inevitably expect to record lower completions in 2020; we are hopeful that from 2021 and beyond, delivery rates will improve. The Council has set out its strategic recovery aims which outline how we shall continue to build a better Newport. This work has resulted in an addendum to the Economic Growth Strategy that sets out how business are being supported during this crisis (see above). Planning has a role to play in dealing with the impacts of this pandemic and this will be reflected in a replacement plan.

in the recovery period after the Covid-19 pandemic. The objective is that the planning system is centre stage in the consideration of built and natural environment issues that have arisen from the pandemic. The paper highlights the existing policies and tools to use for planners towards their aim of better places to live work and relax in. The importance of our environments has been emphasised through this crisis and although the system should do all it can to support economic recovery, this is not to be at the expense of environmental and social factors; the placemaking agenda is to be embraced by all involved in the planning system. This clarification is welcomed and will inform the focus of how to approach the impact on the pandemic in a future LDP.

Building Better Places (July 2020)

3.50 The Welsh Government published 'Building Better Places: Placemaking and the Covid-19 Recovery' in July 2020. The document sets out the planning policy priorities to assist in acting

4. AMR

Key Findings

4.1 As advised in the LDP Manual, a plan review should, amongst other things, draw on the findings of published Annual Monitoring Reports (AMRs). The most recent AMR for Newport was published in October 2020 and covers the period 1 April 2019 – 31 March 2020.

4.2 Overall, the LDP has made positive impacts and the policy framework has been effective in achieving truly sustainable development. The table below sets out a summary of the past five AMRs, this is followed by a quick overview of the assessments and recommendations of each AMR

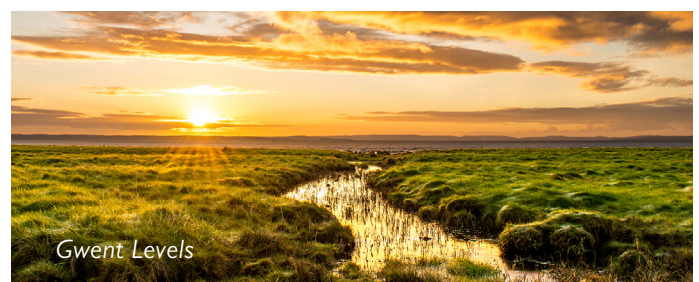
Indicators	2016	2017	2018	2019	2020
Contextual					
Positive	2	1	3	3	1
Mixed	1	0	0	1	0
Negative	1	3	1	0	3
Core and Local					
Positive	21	16	17	19	16
Training required	6	7	5	5	6
SPG Required	0	0	0	0	0
Further research	7	12	13	11	13
Policy Review	1	0	0	0	0
Plan Review	0	0	0	0	0
Sustainability Appraisal					
Sig Positive	37	44	53	41	44
Mix effects	18	30	22	34	29
Sig Negative	0	4	2	1	2
No data/ baseline	29	6	7	8	9

- 4.3 Baseline for monitoring was set in the 2016 AMR. It concluded that overall significant progress was made particularly regarding housing growth and the strategy was being achieved. Employment land delivery was progressing but not at the predicted rate. No indication that a full or part review was required.
- 4.4 For the 2017 & 2018 AMRs the conclusion was again, significant progress was being made with specific reference to housing growth. Also, the strategy, key aims and objectives were being realised. Research on topics including retail, flood risk and delivery of Gypsy and Traveller accommodation were noted as well as concern raised over the loss of community facilities, decreasing city centre footfall and lack of progress on the number of Air Quality Management Areas. The strategy, key aims and objectives were being realised and there was no indication for a full or partial review of the LDP.
- 4.5 The 2019 AMR concluded that significant progress was still being made particularly in reference to housing growth and delivery of employment land. The Strategy, aims and objectives were still being fulfilled. Flood risk and the provision of Gypsy and Traveller transit accommodation were again noted. The LDP was coming up to its fifth anniversary (January 2020) and reference was made to the requirement to review every four years. In particular, the success of allocated housing sites means that there is a need for further allocations. This was the first time SDP was noted which would also trigger a LDP review. It was concluded that discussions with Members and WG would begin on the need for a review.
- 4.6 Finally, the 2020 AMR concluded for the fifth year that significant progress is being made particularly in reference to housing growth and delivery of employment land. The Strategy, aims and objectives are still being fulfilled. city centre footfall levels, flood risk and gypsy and traveller transit accommodation were again noted. Access to local services and facilities have been highlighted and the need for additional residential sites was acknowledged. It was also noted that Welsh Government

officers recommended that a review is undertaken as we have clearly passed the four-year threshold. In addition, the NDF is on its way and will have clear consequences for the Newport area. The role planning can play in economic recovery following Covid is also key. Therefore, the AMR recommendation was for a formal review of the LDP to be undertaken. This review report is the first stage in moving towards a replacement LDP.

Continuing good practice

- 4.7 The policy framework of LDP has been successful in many ways including: delivering its brownfield strategy; housing supply has predominantly been delivered on allocated sites; there is a clear policy framework to encourage renewable energy schemes; no objections from Welsh Water; Newport is meeting its job creation targets; trees and woodlands are being protected and the Council is meeting and exceeding waste targets.
- 4.8 The Sustainability Appraisal has predicted significant positive effects from the implementation of the LDP including: achieving good levels of access to natural greenspace from new residential development; water pollution has not been identified as a concern; electricity consumption per household is reducing. There has been no loss of Public Rights of Way, SINC, greenfield land, loss of woodland, loss of valuable agricultural land, unless the losses have been in accordance with LDP policies. No objections from policy architectural officer; increase in welsh medium education; increased use of rail and the affordable housing delivered in the plan period has met National Design Standards.
- 4.9 It is important to understand the successes made to date to ensure the policy framework remains robust and effective.



Gwent Levels

AMR Topics for further investigation

4.10 There are inevitably topics which deserve a particular focus to reflect on their impact and provide a clear steer not only for the level of review required for the LDP but providing an overview of key issues for a replacement LDP to consider.

Housing Delivery

4.11 The housing delivery rates achieved since the adoption of the LDP have been impressive and Newport is one of the few authorities in Wales to achieve a consistent 5-year land supply of housing. Figure 1 below illustrates the housing delivery achieved to date.

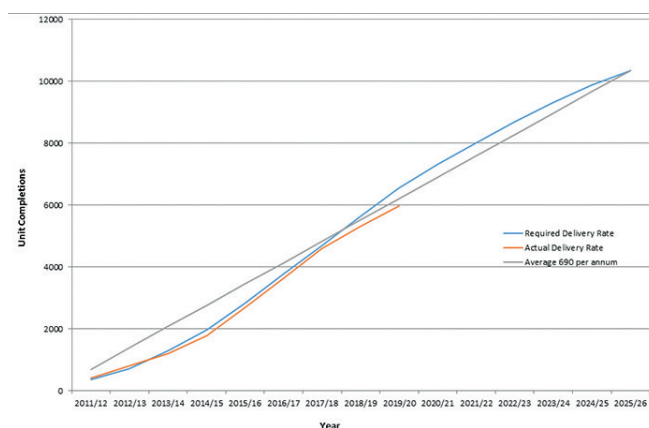


FIGURE 1: LDP HOUSING DELIVERY

4.12 On reflection, the data illustrates that 86% of housing delivery has been delivered on LDP housing allocated sites, with the highest level of windfall completions occurring in the sixth year of the plan. It is possible the reliance on windfall sites will increase as allocated sites are completed, reducing clarity for developers, and undermining the plan-led approach. In addition, 94% of housing has been delivered on previously developed land, consistent with LDP strategy. To deliver sustainable development, the focus on previously developed sites will be recommended where possible.

4.13 The LDP has two strategic housing sites which have been subject to specific monitoring. Both sites are progressing and remain an important supply of housing for the Council, albeit that the rate of delivery has been below that agreed in the LDP. The analysis of the delay is set out in the Annual Monitoring Reports for the LDP in Monitoring Objectives MT4OB4&5.

The need for specific allocations and monitoring details will be considered as part of any new LDP.

4.14 It is not clear whether future levels of growth can be accommodated predominantly on previously developed land over the next plan period. In addition, the NDF highlights Newport as an area for national growth and this will clearly impact on the level of land requirements. The 2018 population projections and household projections show that Newport have the highest level of growth nationally. The need for integration of employment and housing will also place a pressure on the take up of brownfield land from other uses. The impact from Covid-19 on build rates is yet to be quantified but we are predicting healthier rates from 2021 which mean we remain in a strong position to hit the LDP requirement by the end of the plan period. The success of the allocated housing sites means that with the current completion levels and clear progression of many other allocated sites. This does mean that new sites will need to be found to continue this successful achievement to ensure a sufficient housing land supply is maintained.

Affordable Housing

4.15 There has had an outstanding result in terms of having currently delivering 94% of the affordable housing target for 2015-2020. This reflects the increased level of Registered Social Landlord schemes within Newport. The LDP target reflected a realistic provision anticipated from the planning process. That is to say that the affordable housing target was not a direct reflection of all housing need for Newport. This level of need is acute, and the planning system remains one route to providing a supply to meet the demand. Therefore, an assessment of housing need, linked to the previous section on housing delivery, is required and this will provide an updated analysis of housing need for Newport.

4.16 The allocation of new sites, consideration of submarket areas, policy thresholds and impacts on viability will all serve to ensure a future LDP is based on up to date evidence. Monitoring has illustrated that further research on this matter is required because in practice, the level of contributions does not always meet that required by policy.' It is therefore key that work

is undertaken on this matter to ensure that appropriate percentages are set to reflect the increased house prices and up to date build costs.

Gypsy and Traveller Transit

4.17 The LDP has provided a residential Gypsy and Traveller site which covers the identified need set out in the GTAA for the plan period. The GTAA process is ongoing and a future LDP will need to consider if an updated assessment identifies any further need for such accommodation. This assessment also considers the need for transit accommodation, not yet delivered by the current LDP. The introduction of the SDP process will allow this matter to be considered at the regional scale, which is considered a much more appropriate scale. It is therefore concluded that the RLDP process should update the GTAA evidence base and reflect the outcome in its allocation and policy development.

Employment Land Delivery

4.18 The strategy for the LDP sets out an ambitious target for employment growth in terms of land supply and job creation. The number of jobs created over the plan period is above the forecasted trends and economic activity rates are above the Wales average and although the level of predicted development on allocated employment sites is lower than anticipated, it is considered the case that there is a development lag in delivery rather than specific concerns with the land allocations. There has been some loss of employment land to other uses, but this none of which has been approved on allocation employment land. There is still a 13-year land supply for employment uses available in Newport. Nonetheless, the growth rate required for housing supply for the next plan period and the impact from the global pandemic and the way in which it influences how we work in the future, will require a review of the level of job creation and employment land supply to ensure the strategy is robust and well considered.

Retail and City Centre Footfall

4.19 City centre footfall has unfortunately been

falling for several years and the impact from the pandemic will have only exacerbated this. This is not unique to Newport, but it is worth noting the recent investment which indicates the markets confidence in Newport. Since the adoption of the LDP, the centre has seen the completion of the Friars Walk development which has provided a retail and leisure focus to the city centre. It was appreciated in the LDP examination that once this redevelopment had taken place there would be a need to consider its impact and this will be a key consideration for the Council within its review. Work has been undertaken by the Council to provide an up to date evidence base on this matter for development management purposes through the commission of the Nexus Retail and Leisure Study (2019). In addition, the Council has published its City Centre Masterplan and the economic growth strategy and addendum, as detailed in section 3.36 of this report. Clearly a replacement LDP will have to consider these challenges facing the city centre and reflect on the functionality of the space over the next fifteen years.

Flood Risk

4.20 Newport's location alongside the Severn Estuary, the River Usk dividing the city, the complex reed network of the Gwent Levels and the various other pluvial and fluvial water sources within its boundary means that flood risk management and resilience is a key consideration for the LDP. The forthcoming update to national planning policy, through Technical Advice Note 15 and the production of new All Wales Flood Mapping, will require the LDP to take into account this updated policy and evidence base context. A Strategic Flood Consequence Assessment for the RLDP will be required to ensure that any new allocations are justified in terms of any impact on flood risk.

Out Commuting

4.21 The level of out commuting from Newport to other areas is noted but is not considered a significant concern. The strategic location of Newport and its proximity to Cardiff and Bristol means that out-commuting is always going to be a factor, but the plan will need to

consider how to reduce this in the interests of creating a sustainable city. There are many factors that are to be considered within the plans strategy to ensure that this is achieved, including provision for appropriate levels of employment land so we can ensure we are providing jobs as well as housing.

Access to facilities

4.22 Since the adoption of the LDP the Welsh Government have published an updated Index of Multiple Deprivation for Wales (2019). This will be used as a part of the evidence base for a replacement LDP, particularly using the 'access to services' section as a tool to understand where the plan could focus on resolving any known concerns in terms of access to facilities.

Policy Revisions

4.23 Section 5.3 of this report sets out an assessment of the current policy framework of the LDP. It is worth noting that there are a number of policies in the LDP that have been highlighted in the previous AMRs which require specific investigation so that their effectiveness is strengthened in a future LDP. These areas are:

- Community Facilities
- Mineral Safeguarding Area
- Alternative Use of Employment Land
- Loss of Environmental Space
- Site of Historical value
- Development Densities



5. Potential changes required

5.1 Review of LDP Vision, Issues and Objectives

LDP Vision

5.1.1 The Vision was developed to provide the core of the LDP, driving forward the intended changes for Newport from 2011. The development of the Vision was derived from the Newport Community Strategy (2005-2015), where those elements relating to and affected by land use were included.

LDP VISION (2011-2026)

As a gateway to Wales, Newport will be a centre of regeneration that celebrates its culture and heritage, while being a focus for varied economic growth that will strengthen its contribution to the region. It will be a place that people recognise as a lively, dynamic, growing city, with communities living in harmony in a unique natural environment.

The objectives of the plan are set out in section 4 and work will be underway in 2021 on an updated Well-Being Plan for publication in 2023. This review process provides an opportunity to consider the implications of the current context, since adoption of the LDP, and ensure the Vision is appropriately worded.

LDP Objectives

5.1.3 The LDP Vision is delivered through ten Plan Objectives which seek to ensure the delivery of a sustainable development strategy. The ten objectives were developed specifically for the LDP from the Council's Five Corporate Objectives (Caring, Fairer, Learning and Working, Greener and Healthier and Safer City). They were subsequently refined through public consultation.

5.1.4 A review of LDP objectives against the Seven Well Being Goals for Wales⁵ is set out below. The table illustrates which of the seven well-being goals are being delivered by each objective.

5.1.2 Since the adoption of the LDP, the Community Strategy was replaced by a Single Integrated Plan which has been replaced by the Local Well-Being Plan; a requirement of the Well-Being of Future Generations Act (2015).

⁵ For details of the Well-Being Goals please visit: <https://www.futuregenerations.wales/about-us/future-generations-act/#:~:text=The%20Well-being%20of%20Future%20Generations%20Act%20requires%20public,such%20as%20poverty%2C%20health%20inequalities%20and%20climate%20change.>

LDP Objectives	Well – Being Goals						
	Prosperous Wales	Resilient Wales	Healthier Wales	More Equal Wales	Wales of Cohesive Communities	Wales of vibrant culture and thriving Welsh Language	Globally responsible Wales
1. Sustainable Use of Land To ensure that all development makes the most efficient use of natural resources by seeking to locate development in the most sustainable locations, minimise the impact on the environment and make a positive contribution to local communities							
2. Climate Change To ensure that development and land uses in Newport make a positive contribution to minimising, adapting to or mitigating against the causes and impacts of climate change, by incorporating the principles of sustainable design, changes to travel behaviour, managing the risks and consequences of flooding, and improving efficiency in the use of energy, waste and water.							
3. Economic Growth To enable a diverse economy that meets the needs of the people of Newport and those of the wider South East Wales economic region							
4. Housing Provision To ensure that there is an adequate supply of land for housing in the most sustainable locations, and to ensure that the quantity, quality and variety of housing provision meet the needs of the population. Also to foster the creation of places which contribute to local distinctiveness and thriving communities.							
5. Conservation of the Built Environment To ensure that all development or use of land does not adversely affect, and seeks to preserve or enhance, the quality of the historic and built environment.							
6. Conservation of the Natural Environment To protect and enhance the quality of the natural environment, including landscape, protected habitats and species of principal importance for biodiversity in Wales (regardless of greenfield or brownfield status) and the protection of controlled waters.							
7. Community Facilities and Infrastructure To ensure the provision of appropriate new, and/or enhanced existing, community facilities, and to safeguard existing well-used facilities.							

<p>8. Culture and Accessibility To ensure that development proposals and uses are socially and physically accessible to all, taking account of the needs of all individuals.</p>	Yellow	White	Pink	Red	Dark Blue	Blue	White
<p>9. Health and Well-Being To provide an environment that is safe and encourages healthy lifestyle choices and promotes well-being.</p>	Yellow	Orange	Pink	Pink	Dark Blue	Blue	Light Blue
<p>10. Waste To ensure that waste management choices are based on the proximity principle, where appropriate, and a hierarchy of reduce, reuse, recovery and safe disposal, and that there is adequate provision for facilities to enable this to happen.</p>	Yellow	Orange	Pink	White	White	White	Light Blue

5.1.5 The current LDP objectives clearly contribute to achieving all seven well-being goals. Some objectives deliver across all seven goals and have clear multi-benefit outcomes. Any changes to the LDP and its objectives will be informed by and be devised in accordance with the Well-Being Goals.

5.2 Review of LDP Strategy

- 5.2.1 The key elements of the current spatial strategy are to:
- to maximise the use of brownfield sites in the interests of sustainability, regeneration, community cohesion, and urban form;
 - to develop the Eastern Expansion Area of the city, focused on the former Llanwern Steelworks;
 - to regenerate the retail core of the city centre;
 - to protect the landscape, including maintaining the statutory Green Belt on the Cardiff boundary;
 - to conserve protected sites and species, and encourage biodiversity;
 - to foster growth of the city in line with its role in the region, its locational advantages and its distinct sense of place;
 - to build upon the success of Newport’s national and international class sporting facilities

In terms of measuring how successful implementing the strategy has been, each point is discussed below.

Maximise the use of brownfield sites in the interests of sustainability, regeneration, community cohesion, and urban form;

5.2.2 The overall preference of the current LDP strategy was for the development of land within the urban boundary particularly focussing on previously development sites. Regeneration was therefore a key element of the strategy where there are vacant or declining sites in need of improvement for economic, social, and environmental benefit. This regeneration focus was directed to industrial sites including the former Llanwern steelworks, former whitehead works, former Novelis factory, but it also sought the improvement of existing housing estates including Ringland and Alway as well as ensuring the city centre is able to meet its full potential, building on the success of Friars Walk redevelopment.



5.2.3 This focus on regeneration within the urban boundary focussing on previously developed sites has been extremely successful. Over the plan period 94% of all houses delivered have been on previously developed sites and all development on greenfield sites has been within the policy allowance of the plan. The success of the allocated housing sites in the last plan means that new sites will need to be found to continue to ensure a sufficient housing land supply is maintained. In terms of spatial distribution, it is likely that while brownfield sites will continue to play an important role in delivering windfall sites, going forward, it is recognised that there is a limited supply of brownfield land and there is likely to be a role that greenfield sites can play in bringing forward high levels of affordable and family housing and wider provision of strategic infrastructure the LDP.

Develop the eastern expansion area of the city, focused on the former Llanwern Steelworks;

5.2.4 The Eastern Expansion Area is focussed on the two large housing led developments at the former Llanwern Steelworks (Glan Llyn) and Llanwern Village. The former being a brownfield development and the latter greenfield. Both sites have not met the agreed rate of delivery set out in the LDP trajectory but both sites are progressing and it is clear to see the creation of new communities with the implementation of the primary school, play spaces and public house. The analysis of the delay is set out in the Annual Monitoring Reports for the LDP in Monitoring Objectives MT4OB4&5. The strategic focus on the development of this area took precedent in the previous LDP. It will remain a key part in the delivery of a future plan.

Regenerate the retail core of the city centre;

5.2.5 The Plan period has seen the successful delivery of the Friars Walk redevelopment, which has made a positive impact on the retail and leisure core of the city. The previous LDP was written before the implementation of the scheme so the retail policies reflect the situation pre-Friars Walk. Since then, the Council has commissioned a Retail & Leisure Study (Nexus 2019) which recommended a

flexible approach in the city centre to attract investment. The level of vacancies, reduction in footfall numbers and pressure for out of town retail remains a concern but the vitality of district and local centres is encouraging. The impact from Covid-19 is clearly a factor in the function and level of investment of a centre such as Newport's and a replacement plan will need to consider the most appropriate policy framework for the benefit of the city.

Protect the landscape, including maintaining the statutory Green Belt on the Cardiff boundary;

5.2.6 Newport has a unique landscape which provides a positive and attractive hinterland to its urban centre. The AMRs have shown that over the last five years the LDP has managed to ensure that developments do not lead to the loss of important landscape or open space without conforming with plan policies. The exceptions are made when harm from e.g. renewable energy schemes are outweighed by the benefits of the proposed use. The Green Belt and Green Wedge policies have protected those areas from inappropriate developments, and they are likely to remain an important part of protecting the openness and coalescence of urban form.

Conserve protected sites and species, and encourage biodiversity;

5.2.7 Newport has a plethora of internationally, nationally and locally designated biodiversity features. Monitoring of the LDP has been successful in the protection of this resource and the potential impact from future development will be a key factor in a replacement Plan. There has been a contextual shift since adoption and the need for an ecosystems approach in decision making. There has also been the introduction for the requirement for Green Infrastructure Assessments set out in PPW and there are clear considerations from the enactment of the Environment Act Wales in 2016 for the next LDP.

Foster growth of the city in line with its role in the region, its locational advantages and its distinct sense of place;

5.2.8 Newport plays an important role in the region due to its advantageous location, good connections, and its valuable cultural and environmental environs. This has been reflected in the National Development Framework and the RLDP will look to utilise this locational advantage and distinct sense of place.

Build upon the success of Newport's national and international class sporting facilities

5.2.9 The importance of sports and events to Newport continues to increase with the draw of the Newport International Sports Village, National Velodrome, improved Rodney parade facilities, International Convention Centre, and the Ryder Cup venue at the Celtic Manor. Events continue with the establishment of the ABP Newport Wales Marathon in 2018 and the more recent Westfield Health British Transplant Games hosted by the city in July 2019. The infrastructure is well established and the ability of Newport to host major events is evident. There are economic and social impacts from such activities which will need to be considered by a RLDP in terms of facility provision, accommodation needs and job creation.

Delivery of LDP Strategy

5.2.10 The LDP set delivery targets for the delivery of:

- 10,350 homes of which 2,061 were to be affordable; and
- 21.5 hectares of employment land, and the creation of 7,400 jobs;

The LDP has been successful in the delivery of its strategy by providing:

- 5,978 homes (only 575 units below plan requirement), of which 1,223 are affordable (only 78 units below the plan requirement);
- 26 hectares of new employment land and the level of job creation remains above the targeted rate;
- 94% housing development on brownfield land;
- The Eastern Expansion Area is progressing with both strategic sites seeing completions;
- The city centre has changed significantly since 2105 with the implementation of Friars Walk

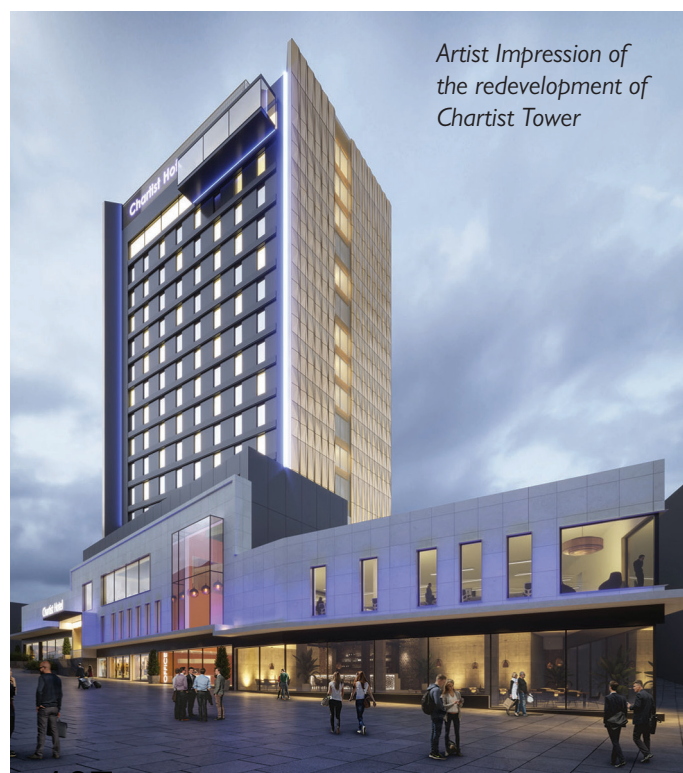
and the more recent investment in city centre regeneration e.g. Mecure Hotel;

- No Sites of Special, Scientific Interest, Sites of Special Nature Conservation, protected trees, Green Belt or Green Wedge land has been lost contrary to policy; and
- The city has hosted a number of sporting and other important events and has seen the creation of more event facilities e.g. ICC at the Celtic Manor.

For information, an overview on the delivery of LDP site allocations is set out in Appendix I.



International Convention Centre



Artist Impression of the redevelopment of Chartist Tower

Conclusion for LDP Strategy

5.2.11 The LDP strategy has been reviewed having regard to the five AMRs, contextual changes, and internal consultation with relevant sections of the Council. Whilst the overall aims of the previous strategy remain relevant the successful delivery of the strategy means that its review is particularly relevant.

5.2.12 The Replacement LDP will cover the period 2021-2036. That will mean that a revised LDP will need to consider the needs of the city, including housing and employment provision, up until 2036. The successful delivery of the adopted LDP will require additional development sites to be allocated. There are also numerous required updates to the LDP evidence base including an up to date Local Housing Market Assessment, Population Projections, Economic Strategy and Land Review, Village Assessment, Gypsy and Traveller Accommodation Assessment. The focus on the city centre regeneration, sporting and events potential as well as protecting our unique environment is likely to continue in line with other Council priorities and the underpinning requirements of delivering sustainable development. There will be a need to consider issues that have come to the fore since the LDP adoption in 2015, including increased concerns on climate change and air quality. All these matters will need to be considered as part of a RLDP.

5.3 Review of LDP Policies

5.3.1 The LDP policies have been reviewed having regard to the following:

- The findings of the past five Annual Monitoring Reports (AMR's);
- Significant contextual changes that have occurred since the adoption of the Plan, including changes in national, regional, and local policies, legislation and strategies;
- Internal consultation has occurred with various departments, including planning committee, within the Council. Virtual focus groups, questionnaires and presentations were used to gather information on the limitations, omissions, and successes of the current policy framework.

5.3.2 A summary of the policy review assessment is set out in Appendix 2. This gives an overview of whether a policy/allocation is functioning effectively, whether any amendments are likely to be needed and whether any policies should be removed or amalgamated as part of the Plan revision process. The policy assessment undertaken to date is not considered to be definitive and further consideration will be given to the need to revise the Plan's policies as part of the revision process.

5.3.3 The revision of the Plan will also need to consider the implications of an extended Plan period. The current Plan runs to 2026, with the Replacement Plan setting a plan period from 2021-2036. Extending the Plan period will result in a revised dwelling need and a requirement for new sites for both market and affordable dwellings. It will need to take account of the revised version of Planning Policy Wales, latest population and household projections and a revised Local Housing Market Assessment, as well as other updates to the evidence base. Furthermore, the review process can also explore the ways that a new plan could respond to current challenges such as the climate change, projected increase in population for Newport and other issues identified below. These updates and issues will need to be thoroughly considered and addressed in a comprehensive manner.

5.3.4 Based on the policy review assessment, the key policy topic areas are discussed in more detail below.

Climate Change: SPI, SP3, GPI, CE10

5.3.5 The LDP looks to tackle the causes and effects of climate change through the adoption of sustainable principles and development. Reflecting on the sustainable foundation of the Plan as a core principle, future iterations will need to reflect on the most up to date considerations and ensure a suitable policy framework.

5.3.6 **Flood Risk:** Much of Newport is located on the floodplain, and consequently Newport deals with a significant number of applications affected by flood risk. Monitoring for the flood

risk policies shows 29 applications have been permitted in flood zone which did not meet the flood risk criteria set out in TAN15 over the 5 years of AMRs. While these applications were considered permissible on the basis of regeneration, or that there was an acceptable level of risk or that there was no discernible increased risk from the development, there is clearly a dichotomy which will need to be investigated further.

5.3.7 Of relevance to the policy review is the forthcoming update to Technical Advice Note 15, the production of new All Wales Flood Mapping, an updated Strategic Flood Consequence Assessment, and the mandatory standards for Sustainable Drainage Systems.

5.3.8 **Renewable Energy:** The past AMRs have found that the renewable energy policies are functioning effectively in respect of the provision of renewable energy, with a total of 11 schemes incorporating on-site renewable energy, creating up to 80.35MW of energy, permitted since the LDP's adoption (excluding permitted development). However, significant contextual changes have occurred in relation to renewable and low carbon energy since LDP adoption which will need to be considered and addressed through the LDP revision process.

5.3.9 Welsh Government produced a revised version of "Planning for Renewable and Low Carbon Energy" in September 2015. The update includes an additional section relating to how local planning authorities assess the potential for solar farm developments. The revised toolkit provides a methodology to assist in the production of Renewable Energy Assessments (REAs) and additional advice on how to translate the results of the REAs into the LDP evidence base, resulting policies and setting targets. Local authorities are expected to undertake a proactive approach to all forms of renewable and low carbon energy generation. The revised LDP will need to consider the revised Toolkit and address the additional requirements set out within it.

Health: SP2, GP7

5.3.10 It is considered that current policies regarding health are functioning effectively. However, as part of the review of the plan a review of these policies will take place to ensure that they cover all aspects of the health agenda that planning has the ability to make a difference. Overall, the plan review process will need to look beyond AMR reporting and the analysis of existing policy in response to the increased evidence, which highlights the links between health and the built environment and seeks to favour the creation of healthier and active environments. In particular, the review process can consider things like the need for dementia friendly environments and explore the links between obesity, health and well-being, air quality and healthy and active lifestyles and the built environment and consider the most appropriate policy response to this changed context. This will be informed by the Health Impact Assessment set out in the Integrated Sustainability Appraisal work for the RLDP.



Green Infrastructure: SP5, SP6, SP7, SP8, SP9, CE1, CE2, CE3, CE9

Heritage: SP9, CE4, CE5, CE6, CE7

5.3.11 The existing open space and accessible natural green space policies contained in the LDP were informed by various technical background papers. These assessed the quantity of outdoor recreation, public open space provision, allotment provision, Green Wedge, Settlement boundary, SINC's etc. across the authority. The new requirement set out in PPW for a Green Infrastructure Assessment will combine the update of these technical papers and other requirements of GIA work to inform plan allocations and policy wording. The effectiveness of the green infrastructure related policies has been monitored by the 5 AMR's produced to date and have shown that that this has been effective.

5.3.13 The Heritage polices are generally considered to be functioning effectively. All previous AMR's have shown that the vast majority of relevant applications received on historic environment assets were considered to be policy compliant subject to conditions/ recommendations placed on the permission. A few applications were permitted with an outstanding objection from statutory heritage advisors and research will be undertaken to understand what alterations may be necessary to aid any concerns raised. Signposting to recent contextual changes e.g. Cadw guidance is likely to be helpful.

Ecology: SP4, SP9, GP5, CE8

5.3.14 The LDP was informed by Habitats Regulations Assessment (HRA), the purpose of which is to assess the impacts of a land use plan, in combination with the effects of other plans and projects, against the conservation objectives of internationally important European sites of nature conservation importance, such as Special Areas of Conservation and Special Protection Areas (designated for their ecological status) and to ascertain (following screening) what needs Appropriate Assessment (AA). This process shall be undertaken as part of the RLDP and any amendments to the policy framework shall be considered.



5.3.12 Given this, it is considered that these policies are functioning effectively there are opportunities to build upon the importance of connectivity by exploring and consolidating upon linkages with other policy areas, particularly those that promote green infrastructure. An appropriate review of evidence and the role of the Placemaking and Design will be undertaken as part of developing an understanding of the benefits and value of such an approach along with a review of the evidence base, to ensure it takes account of changes in national planning policy and contextual changes.

5.3.15 The ecological policies seek to ensure the protection and enhancement of the natural environment, and in doing so, contribute towards moderating the potential adverse effects of other policies that infer physical development even on previously developed land. The polices are generally considered to be functioning effectively but the evidence base will need to be updated to ensure that the relevant designations, species, and habitats are considered. The recent requirement for ecological mitigation will also need to be considered to ensure clarity of process.

Housing: SPI0, SPI1, HI- HI7

5.3.16 Following the revision to PPW and the revocation of TAN 1 in its entirety, the

revised LDP Manual (Edition 3) sets out how annual housing completions must be monitored against the Anticipated Annual Build Rate (AABR). The RLDP will need to include a housing trajectory, developed with key stakeholders including the development industry, taking into account the phasing of sites to ensure that it meets the requirement of the LDP manual.

- 5.3.17 The housing requirement set out in the current LDP is 10,350 dwellings (Policy SPI10) over the Plan period 2011-2026. This figure was primarily informed by the 2008 WG household projections which projected a population rise of 10% over the Plan period. The latest official WG population and household projections (2018) continue to project an increase in population for Newport. The WG projections will be used as the basis for informing the future housing requirement figures for the RLDP. The next plan process will need to assess the most appropriate level of growth for a Plan period beyond the end date of the existing LDP.
- 5.3.18 The housing delivery rates achieved since the adoption of the LDP have been impressive delivering 5,978 units to date, that is only 575 units below the LDP target. (April 2020). Newport has been one of the few authorities in Wales to achieve a consistent 5-year land supply of housing and while the 2020 AMR noted a slight under delivery (4%) against agreed rates for housing sites, set out against the Average Annual Requirement (AAR) it was considered that delivery remain acceptable.
- 5.3.19 The need for integration of employment and housing place a pressure on the take up of brownfield land from other uses. The success of the allocated housing sites in the last plan means that with the current completion levels and clear progression of many other allocated sites, the LDP allocations for housing are meeting demand. This does mean that new sites will need to be found to continue this successful achievement to ensure a sufficient housing land supply is maintained. In terms of spatial distribution, it is likely that while brownfield sites will continue to play an important role in delivering windfall sites, going forward, it is recognised that that

there is a limited supply of brownfield land and there is likely to be a role that greenfield sites can play in bringing forward high levels of affordable and family housing and wider provision of strategic infrastructure the LDP.

Employment: SPI7, SPI8, EMI, EM2, EM3

- 5.3.20 The Local Development Plan's employment land is safeguarded for employment purposes by Policies SPI7 and EMI. The future prosperity of the local economy is facilitated by ensuring that the authority can offer a range and choice of employment sites and premises for employment uses. As part of the revision process, consideration will be given to the employment strategy to take account of the industrial and business allocations that have been developed since LDP adoption. Consideration will also need to be given to the 'economies of the future' and their locational, sites and premises requirements.
- 5.3.21 The AMRs indicate significant progress has been made in reference to the delivery of employment land allocated under Policies SPI7 and EMI. However, it is noted 16 planning applications over the course of the 5 AMR's that involved the loss of employment land did not fully consider policy EM3. This was indicated as "training required". While the majority of applications did consider this policy, any future LDP revision should consider if the policy wording and criteria are, appropriately and workable for the future.

Planning Obligations: SPI3, H4

- 5.3.22 The planning obligations policies are generally considered to be functioning effectively. Amendments may be required in particular with regard to the strategic and site specific viability work and subsequent thresholds set to reflect the updated assessments.

Community Facilities: SPI2, CF1-CF13

- 5.3.23 The community facility policies are generally considered to be functioning effectively, however, consideration should be given to whether there is a need to narrow the definitions within the policies such as community facilities (CF12) and Tourism (CF8) and what opportunity there are to combine underused policies.

Transport: SPI4, SPI5, SPI6, GP4, TI -T8

5.3.24 The review of the Plan's transport policies indicates that there are currently no concerns with their effectiveness and implementation, as detailed in Appendix 2. However, a number of contextual changes have occurred since the Plan's adoption, which will need to be taken into account in the LDP revision process including subsequent outcomes of the South East Wales Transport Commission and Metro.

5.3.25 The Council has undertaken a series of existing and integrated Active Travel Route Maps; this will provide a new evidence base for the RLDP on sustainable travel matters. There is a clear role set out for the planning system to facilitate active travel, and the RLDP will need to consider the outputs and how the cultural shift towards prioritising active travel is undertaken e.g. through developments, planning policy, planning obligations etc.

Retail and the City Centre: SPI9, RI - RII

5.3.26 The existing LDP was informed by the Colliers Retail Study and Capacity Assessment, (2012), which evidenced the need to focus new retail and commercial developments in the identified retail hierarchy to assist in sustaining and enhancing the city centre, district and local centres and building sustainable communities. Since the adoption of the LDP the city centre has seen the completion of the Friars Walk development which has provided a greater retail and leisure focus to the city centre and this will be a key consideration for the Council within its review. In addition, the monitoring of the retail policies set out in the 5 AMRs has continually raised concern in particular with the primary and secondary shopping frontages, the level of vacancies, reduction in footfall numbers and pressure for out of town retail.

5.3.27 Work has already been undertaken by the Council to provide an up to date evidence base on this matter for development management purposes through the commissioning of the Nexus Retail and Leisure Study (2019). In addition, the Council has published its City Centre Masterplan and the economic growth strategy and addendum.

The updated retail and leisure study will help inform the Plan revision in terms of retail strategy, retail policies and LDP allocations. Further work will also be undertaken in response to the current challenges faced by the High Street to inform the merits or otherwise of how future LDP policy can respond most effectively.

Waste: SP20, W1, W2, W3

5.3.28 The Waste policies are generally considered to be functioning effectively and the SPG has been considered useful. The need to provide enough land for waste facilities, as required by PPW, will be considered as well as the need for any Council required facilities.

Minerals: SP21, M1, M2, M3, M4

5.3.29 The Minerals policies were prepared in the context of PPW, MTANI and the Regional Technical Statement (RTS) of the South Wales Regional Aggregates Working Party (SWRAWP) (October 2008). A second ongoing Review of the RTS is currently being finalised and endorsement sought from each MPA. The review of the LDP will need to consider the implications of the recommendations in the second Review of the RTS along with any changes in current Government guidance. The monitoring of the Minerals policies set out in the AMRs show that the policies SP21, M1 and M2 have been constantly shown as "training required" any future LDP revision should consider if the policy wording is appropriately and workable.

Supplementary Planning Guidance

5.3.30 A number of supplementary planning guidance (SPG) documents to support key LDP policy areas have been approved by the Council since adoption of the plan. These are:

- Planning Obligations SPG
- Affordable Housing SPG
- Archaeology and Archaeologically Sensitive Areas SPG

Wildlife and Development SPG

- House Extensions and Domestic Outbuildings SPG
 - New Dwellings SPG
 - Flat Conversions SPG
 - Waste Storage and Collection SPG
 - Parking Standards SPG
 - Housing in Multiple Occupation SPG
 - Sustainable Travel SPG
 - Mineral Safeguarding SPG
 - Outdoor Play Space Provision SPG
 - Trees, Woodland, Hedgerows and Development Sites SPG
 - Air Quality SPG
 - Security Measures for Shopfronts and Commercial Premises SPG
 - Caerleon Conservation Area Appraisal SPG
 - Stow Park Conservation Area Appraisal SPG
 - Clytha Conservation Area Appraisal SPG
 - The Shrubbery Conservation Area Appraisal SPG
- 5.3.31 A review of the existing SPG, including ones recently adopted, will be undertaken as part of the LDP Revision process where time allows. The need for additional SPG will also be a matter for the revised LDP process.
- Proposals Plan and Constraints Plan**
- 5.3.32 The form and content of the LDP Proposals Plan will require changes as part of the LDP Review to reflect any changes to the plan.
- 5.3.33 The LDP Constraints Plan contains designations that are not directly proposals of the LDP but are constraints to development created by legislation or other mechanisms outside of the LDP process such as Flood Risk Areas and SSSI's, etc. The printed Constraints Plan for the LDP represents a point in time and includes several designations particularly flood risk areas that have been updated since adoption of the LDP and therefore it is out of date. In addition to a printed plan the Constraints Plan, alongside the Proposals Plan, will be produced in an electronic form with public access that will allow for it to be updated, as necessary.



6. Future evidence base requirements

6.1 The contextual and evidence base changes that have occurred since the Plan's adoption in 2015, including updates to WG population and household projections, indicate that the RLDP will need to be revised to reflect such changes. Other elements of the LDP evidence base will also need to be updated as part of the plan preparation process, as detailed below. To inform the review of the LDP there will be a need to update various elements of the evidence base that informed the current Local Development Plan in order to fully understand the land use requirements of the city up to 2036. A sample of potential evidence base studies which may be required to inform the LDP include:

- Population and household forecasts
- Local Housing Needs Assessment
- Employment Land Review
- Affordable Housing Viability Assessment
- Gypsy and Traveller Accommodation Needs Assessment
- Strategic Flood Consequence Assessment
- Retail and Leisure Study
- Green Infrastructure Assessment
- Renewable Energy Assessment
- Landscape Assessment
- Aggregate Monitoring Surveys

6.2 This is not a definitive list and additional evidence base requirements may emerge as the plan revision progresses. Opportunities to undertake this work with other LPAs is discussed in Section 7.

■ Sustainability Appraisal including Strategic Environmental Assessment

6.3 A requirement of the LDP process is that Sustainability Appraisal (SA) incorporating Strategic Environmental Assessment (SEA) informs preparation of the LDP. The SA/SEA process is integral to the development of the LDP to ensure the policies in the LDP promote Sustainable Development through integration of the key economic, environmental, social and cultural objectives in the development of the LDP policies and proposals and take account of any significant effects on the environment. The SA/SEA has been an iterative process throughout preparation of the LDP and policies and proposals in the LDP reflect this.

6.4 A monitoring of the Sustainability Appraisal Objectives is undertaken on an annual basis and reported through the LDP Annual Monitoring Report. This enables the Council to assess the extent to which the LDP is contributing to the achievement of sustainable development and to identify any concerns. To inform the review of the LDP, it will be necessary to revisit and update the environmental, social and economic baseline information, along with the review of relevant plans policies and programme. The SA Monitoring Framework including the SA Objectives will need to be reviewed to ensure this remains up to date, and this will include considering whether the methodologies need revising due to changes in legislation.

6.5 An Integrated Sustainability Appraisal⁶, (SA) incorporating Strategic Environmental Assessment⁷ (SEA) and Welsh Language Impact Assessment (LIA), is a statutory requirement of LDP preparation. The Council will undertake an Integrated Sustainability Appraisal (ISA) but shall broaden the scope of this integrated assessment to ensure that it also captures a few other impact assessments. This approach will assess the contribution the RLDP can make to the Well-Being Goals and ensures a collaborative approach on a variety of issues, recognising links between them and avoiding duplication of work. This holistic and integrated approach will ensure that as well as the SA, SEA and LIA (noted above) the integrated assessment will include as a minimum an Equalities Impact Assessment (EIA), Health Impact Assessment (HIA) and a clear understanding of how the Welsh well-being goals are influencing the plan. For future reference, the Integrated Sustainability Appraisal should be considered to include the

broader assessments as noted above. The ISA process will run concurrently with the plan making process and forms an iterative part of plan preparation.

■ Habitat regulations assessment

6.6 The LDP was informed by Habitats Regulations Assessment (HRA), the purpose of which is to assess the impacts of a land use plan, in combination with the effects of other plans and projects, against the conservation objectives of internationally important European sites of nature conservation importance such as Special Areas of Conservation, Special Protection Areas (designated for their ecological status) and RAMSAR and to ascertain following screening what needs Appropriate Assessment (AA). As part of the review of the LDP, the HRA will need to be reviewed.



Newport Wetlands Centre

⁶ Section 62 (6) Planning and Compulsory Purchase Act 2004

⁷ European Union Directive 2001/42/EC & Environmental Assessment of Plans and Programmes (Wales) Regulations 2004

7. Options for review

7.1 A key outcome of the final Review Report is to make a recommendation on the type of revision process to be followed, based on the evidence contained in the report. This can either be a short form or full revision. This Review Report forms a discussion document to seek the views of stakeholders on the best way to proceed. A conclusion on the form of review is set out in section 8.

■ Joint LDPs and joint working

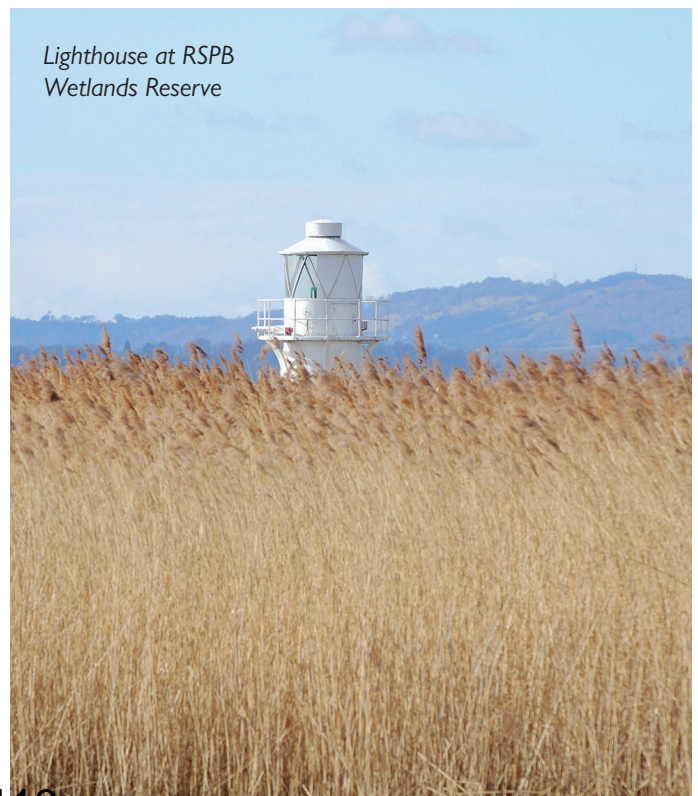
7.2 In line with the development plan manual, consideration must be given to the scope for preparing a Joint LDP with another LPA. It is noted that out of the 10 authorities in South East Wales, there are no examples of a joint LDP being undertaken. There are however many examples of joint working within the region. Of the 10 authorities only Cardiff and Caerphilly, as neighbouring authorities, have a similar timescale for the preparation of a replacement plan. On reflection, it is considered that the preparation of a joint plan is not appropriate due to the lack of synergy on key aspects of plan preparation. Each authority has unique factors to consider within their own plan that would not benefit from a strict joint approach, e.g. Newport's identification in the 'Future Wales: The National Plan 2040' (NDF) as a national area of growth.

7.3 Nonetheless, there are clear opportunities for joint working within the region. Where opportunities have arisen, Newport has taken the opportunity to commission work with

neighbouring authorities e.g. Renewable Energy and Employment studies. This will continue throughout the plan development whenever possible. There is an existing collaborative relationship across the South East Wales region which will be utilised to ensure that we maximise efficiencies and consistency where appropriate and cross-boundary matters are adequately addressed.

7.4 It is therefore considered that the most appropriate way forward is to respond to local issues and maintain plan coverage and wherever possible produce and share a joint evidence base.

Lighthouse at RSPB Wetlands Reserve



8. Conclusions and the next steps

Recommendation

8.1 In terms of the procedural route for revision of the Newport LDP, it should be noted that the plan is already subject to the statutory 4-year full review, and as such, all aspects of the plan will need to be assessed to consider

if they remain sound and fit for purpose. It is considered, irrespective of the deadline for review set by legislation, that based on this report, the most appropriate form of review is the Full Revision Procedure and a Replacement LDP is prepared for the period 2021-2036.



9. Glossary

AAR	Average Annual Requirement
AMR	Annual Monitoring Report
AVHA	Affordable Housing Viability Assessment
CCR	Cardiff Capital Region
CIS	Community Involvement Scheme
DA	Delivery Agreement
FW	Future Wales: The National Plan 2040
GTAA	Gypsy and Traveller Accommodation Assessment
HRA	Habitat Regulations Assessment
JHLAS	Joint Housing Land Availability Study
LDP	Local Development Plan
MPA	Mineral Planning Authority
MTAN	Mineral Technical Advice Note
MYE	Mid-Year Population Estimates (supplied by Office for National Statistics)
NDF	National Development Framework
ONS	Office for National Statistics
PCPA	Planning and Compulsory Purchase Act
PPW	Planning Policy Wales
PSB	Public Service Board
RLDP	Replacement Local Development Plan
SA	Sustainability Appraisal
SAC	Special Area for Conservation
SEA	Strategic Environmental Assessment
SEWSPG	South East Wales Strategic Planning Group
SINC	Site of Importance for Nature Conservation
TAN	Technical Advice Note

Appendix I:

LDP Allocation review

AI.1 The following tables summarises the progress made with regards to the delivery of allocations listed within the LDP. This includes Housing, Gypsy and Traveller Accommodation, Employment Land and Education Allocations

PROGRESS MADE ON LDP HOUSING ALLOCATIONS

LDP Reference	Units to deliver within LDP	Units complete	% complete	Progress Update
HI(1) McReadys, Ponthir Rd	54	56	100%	Site complete.
HI(3) Llanwern Village	1100	31	3%	Developer on site progressing
HI(4) Pirelli	250	221	100%	Site complete.
HI(5) Glebelands	153 (Now 215)	58	27%	Developer on site progressing
HI(7) Bethesda Close	22	22	100%	Site complete.
HI(8) The Severn Stiles	23	0	0%	Developer interest in the site.
HI(9) Frobisher Road	16	16	100%	Site complete.
HI(10) Pencoed Castle	12	0	0%	Access road has been implemented.
HI(11) Laburnum Drive	20	20	100%	Site complete.
HI(12) Former Tredegar Park Golf Course	150	119	79%	Developer on site progressing
HI(13) Allt-Yr-Yn Campus	125	125	100%	Site complete.
HI(14) Monmouthshire Bank Sidings	517	517	100%	Site complete.
HI(15) Victoria Wharf, Old Town Dock	130	0	0%	Planning permission (16/0789) granted 21/09/2017 for 93 units with a 3 year time period for implementation.
HI(16) Penmaen Wharf	160	0	0%	Planning permission has lapsed. The site is within Flood Risk Zone C2.

HI(17) Former Hurrans Garden Centre	60	60	100%	Site complete.
HI(19) Land at Hartridge High School	65	0	0%	The site is linked to the development of the Jigsaw site.
HI(21) Former Floors 2 Go	10	0	0%	No planning permission in place. No completions expected within the next 5 years.
HI(23) Traston Lane	21	0	0%	Planning permission for a revised scheme was granted in late 2012. Limited progress made.
HI (24) 30-33 High Street	16	16	100%	Site complete.
HI(25) Taylors Garage	71	71	100%	Site complete.
HI(26) Ty Du Works	26	26	100%	Site complete.
HI(30) Rear of South Wales Argus	89	89	100%	Site complete.
HI(31) Roman Lodge Hotel	10	0	0%	Owner is concentrating on the hotel use. Residential development not anticipated within the next 5 years.
HI(32) Former Sainsbury's	140	0	09%	Mixed use proposal for 140 residential units; student accommodation; hotel and commercial. Outline planning permission approved 20/04/2016. The outline permission is very detailed with not many outstanding issues to be approved via reserved matters. Demolition and construction of a flood defence bund in conjunction with NRW is now complete, however very little progress has been made since.
HI(34) Bankside Coverack Road	38 Now 76	0	0%	Revised scheme for 76 apartments approved subject to the signed of a S106 – ref: 18/1169.
HI(36) Farmwood Close	10	0	0%	Extant planning permission which has been implemented by the commencement of 10 units. No known intent for the site.
HI(37) City Vizion	338	338	100%	Site complete.
HI(38) Lysaghts Village (Orb Works)	559	559	100%	Site complete.

HI(39) Former Bettws Comprehensive	224	224	100%	Site complete.
HI(40) Westmark, Old Town Dock	154	64	41%	Footings are in place for the remaining 90 units. There is no information as when the last block of flats will be completed.
HI(41) Trinity View	16	15	94%	Long standing self-build development. Properties tend to be delivered at a rate of 1 house per annum.
HI(42) Black Clawson (Alexandra Gate)	63	63	100%	Site complete.
HI(43) Portskewett Street (Liberty Grove)	92	0	0%	Planning application 17/0038 for 92 flats granted 20/03/2018.
HI(44) Turner Street	32	32	100%	Site complete.
HI(45) Lysaghts Parc	100	0	0%	Remaining 100 units of a wider residential scheme. Linc Cymru are in the process of selling the land for development.
HI(47) Glan Llyn	4000	780	20%	Developer on site progressing with two developers on site.
HI(51) Whitehead Works	498	0	0%	Whitehead Development Company Ltd (subsidiary of Tai Tirion) set up to promote the site. Welsh Government has agreed a £7m commercial loan to WDC. Remediation works are complete on site. Resolution to approve the outline planning application has been agreed subject to the signing of a S106. (15/0775). 18/1039 – Phase 1 Reserved matters application approved 17/3/20. 471 Units (226 Tirion, 245 Lovell).
HI(52) Old Town Dock Remainder – East Dock Road	288	45	16%	Site has progressed with 89 completions and a developer interest on remainder of the site
HI(53) Bideford Road	35	0	0%	Completions not anticipated within the next 5 years.
HI(54) Jubilee Park Former Alcan Site	934	830	89%	Developer on site progressing
HI(55) Jigsaw Site, Ringland	200	0	0%	Site to be promoted for development alongside Hartridge High School site.
HI(56) Opposite Belmont Lodge	122	0	0%	Permission is extant and owner has concentrated on the implementation of the ICC. Housing development not anticipated over the next year.

HI (57) Treberth Crescent	58	0	0%	Pobl scheme – 18/1231 for 45 older person homes approved. Expected to start on site in 2020.
HI (58) Panasonic	250	250	100%	Site complete.
HI (59) 24 Crawford Road	10	0	0%	18/0255 - Partial discharge of condition relating to app 11/1258 for 21 flats.
HI (60) Parry Drive	15	15	100%	Site complete.
HI (61) Former Postal Exchange, Mill Street	70	0	0%	Residential no longer being pursued on the site – converted to new office building.
HI (62) Former Queens Hill School	92	0	0%	18/0507 – Hybrid application – outline for 96 units and full for some demolition works – approved 05/02/2019 20/0236 – Condition discharge - awaiting decision
HI (63) Telford Depot	60	0	0%	NCC owned site. No progress.
HI (64) Uskside Paint Mills	53	0	0%	Completions not anticipated during the next 5 years.

PROGRESS MADE ON DELIVERY OF GYPSY/TRAVELLER ALLOCATION

LDP Reference	Total Pitches	Pitches complete	% complete	Progress Update
HI 6 Hartridge Farm Road	Up to 43	3	7%	A full planning application for 35 pitches on the Hartridge Farm Road site was approved in August 2016. Delivery will be phased to ensure the supply meets the demand. Three pitches have been fully completed, with the infrastructure in place for nine.

PROGRESS MADE ON DELIVERY OF EMPLOYMENT LAND ALLOCATIONS

LDP Reference	Use	Hectares developed	% complete	Progress Update
EMI (i) Duffryn	B1, B2 and B8	0	0%	No progress has been made on this site.

EMI (ii) East of Queensway Meadows, South of Glan Llyn	B1, B2 and B8	0	0	An application for a B8 Lorry Park and associated infrastructure (3.14ha) has been approved.
EMI (iii) Celtic Springs	B1	0	0	An application for residential development on this land was resisted by the Council. No employment land proposals have come forward for this allocation to date.
EMI (iv) Solutia	B1, B2, B8 and leisure	2.56	6.0%	Eastman (formally known as Solutia) is developing this site for development that directly benefits their chemicals business. A storage facility and heat and power plant has already been constructed and a Therminol Production plant was completed in 2016/17. (Therminol is a high temperature heat transfer fluid and is used in products such as solar panels).
EMI (v) Gwent Europark	B8 distribution	0	0	An outline planning permission for B8 distribution centres is in place for this allocation, but there have been no signs of any development progress in recent times. An application was approved in 2019 to allow B1 and B2 use at the site as well.
EMI (vi) Land off Chartist Drive	B1, B2 and B8	0	0	No progress has been made on this site.
EMI (vii) Llanwern former steelworks, eastern end	B1, B2 and B8	7.97	22.5%	Phase I of the Celtic Business Park has been completed. This was the first speculative employment scheme to be completed in Newport since before the recession. The CAF train factory (6ha of employment land) opened in late 2018. Additional phases of land also have permission but no
EMI (viii) Phoenix Park (former Pirelli works) Corporation Road	B1, B2 and ancillary use	0	0	No progress has been made on this site.
EMI (ix) Godfrey Road (Rear of Station)	Business and Commercial uses	0	0	No progress has been made on this site.

PROGRESS MADE ON LDP HOUSING ALLOCATIONS

LDP Reference	School	Progress Update
CF13 i) Former Whitehead Works, Cardiff Road	Primary School	Outline planning permission for a residential scheme along with a school has been granted, subject to signing of the S106 agreement.
CF13 ii) Jubilee Park (Former Alcan/Novelis Site)	Primary School	The school opened for the first day of term in September 2017.
CF13 iii) Glan Llyn	Primary School 1	The school opened for the first day of term in September 2019
CF13 iii) Glan Llyn	Primary School 2	No plans to deliver the second primary school at Glan Llyn yet.
CF13 iv) Llanwern Village	Primary School	The residential development has now commenced. The school will be delivered at a later phase.

Appendix 2:

LDP Policy review

A2.1 The following tables summarises the policy review assessment undertaken with specific Council departments and LDP users to ensure that as well as reflecting on the implementation of the policies as written any limitations or omissions are captured by those implementing the LDP.

A2.2 For each policy it should be assumed that amendments may be required to reflect contextual changes, evidence, updated legislation, and national policies and accommodate future changes to spatial strategy.

Strategic Policies		Commentary
SP1	Sustainability	Review necessary – to reflect the placemaking agenda and ensuring the policy does not duplicate other policy areas.
SP2	Health	Review to consider Air Quality, and Dementia friendly topics as well as links between open spaces and physical and mental health.
SP3	Flood Risk	Revision necessary – 4 of the past 5 years – issues have been highlight with monitoring target (MBI,MT3). The role of NRW and NCC needs clarifying this may be done through the new TAN 15. Impact of new flood maps and outcome of SFCA will influence future policy wording
SP4	Water Resources	Functioning effectively
SP5	Countryside	A review of both the Settlement and Village boundaries will take place to ensure it reflects the up to date position from 2015 and development allocation decisions.
SP6	Green Belt	Functioning effectively.
SP7	Green Wedges	A review of both the boundary of the Green Wedge will take place to ensure it reflects the up to date position from 2015 and development allocation decisions.
SP8	Special Landscape Areas	Functioning effectively – SPG has not been provided to date review on whether this is still necessary.
SP9	Conservation of the Natural, Historic and Built Environment	AMR highlighted as a concern where an outstanding objection remained in regard to the impact on a Listed Building. Further investigation as to the effectiveness of this policy and signposting to more up to date guidance, post Historic Environment Act.
SP10	House Building Requirement	Revision necessary – revised level of housing growth over new plan period in relation to housing requirement and spatial strategy.
SP11	Eastern Expansion Area	Revision necessary – is this allocation still necessary due to successful implementation of this policy

SPI2	Community Facilities	Amendments required to considered what is defined as community facilities and where they are best located. There is a need to consider the purpose of the policy and what is trying to be achieved.
SPI3	Planning Obligations	Functioning effectively – SPGs will be updated to reflect new requirements linked to viability work for new developments.
SPI4	Transport Proposals	Amendments required to considered Active Travel and transport hierarchy, outcome of WG decision on M4 relief road, RLDP growth options and development allocation decisions.
SPI5	Integrated Transport	Amendments required to considered Active travel and transport hierarchy.
SPI6	Major Road Schemes	Amendments required to considered transport hierarchy, outcome of WG decision on M4 relief road, RLDP growth options and development allocation decisions.
SPI7	Employment Land	Revision Necessary - to reflect RLDP growth options and to assess the long term impact of Covid and how the current shift to home working will impact on employment sites long term.
SPI8	Urban Regeneration	Updates and amendments required to reflect successful delivery of regeneration schemes outlined in policy text, contextual changes, evidence, updated legislation and national policies and accommodate future changes to spatial strategy.
SPI9	Assessment of Retail Need	Revision Necessary – the current plan was adopted prior to the Friars Walk redevelopment. The level of vacancies, reduction in footfall numbers and pressure for out of town retail remains a concern and a more flexible approach should be considered.
SP20	Waste Management	Functioning effectively.
SP21	Minerals	Revised to Reflect up to date Regional Technical Statement.

General Policies		Commentary
GP1	Climate Change	Revision necessary to reflect spatial strategy over the extended period.
GP2	General Amenity	Functioning effectively.
GP3	Service Infrastructure	Functioning effectively.
GP4	Highways and Accessibility	Amendments required to considered Active Travel and transport hierarchy
GP5	Natural Environment	Amendments to include signposting to enhancement requirements, Bee Friendly City status, outcome of HRA and ISA. Review the process of monitoring in planning decisions.
GP6	Quality of Design	Amendments required to clearer define “Good Design,” and opportunity to stress the importance of place-making.
GP7	Environmental Protection and Public Health	Revision necessary - to reflect and provide enhanced clarity on dealing with pollution matters e.g. noise, overheating and air quality matters.

Environment Policies		Commentary
CE1	Routeways, Corridors and Gateways	Functioning effectively
CE2	Waterfront Development	Functioning effectively.
CE3	Environmental Spaces and Corridors	Functioning effectively.
	Heritage	Review the need to update in line with new legislation and link with the Newport Offer.
CE4	Historic Landscapes, Parks, Gardens and Battlefields	Functioning effectively.
CE5	Locally Listed Buildings and Sites	Review whether a local list is to be produced
CE6	Archaeology	Functioning effectively
CE7	Conservation Areas	Functioning effectively.
CE8	Locally Designated Nature Conservation and Geological Sites	Functioning effectively.
CE9	Coastal Zone	Amendments may be required to reflect impact from the National Marine Plan and monitoring requirements
CE10	Renewable Energy	Revision necessary to reflect government and local targets, with the policy text updated to be more in line with national policy.

Housing Policies		Commentary
H1	Housing Sites	Revision necessary – revised level of housing growth over new plan period in relation to housing requirement and spatial strategy.
H2	Housing Standards	Review whether the policy can further reflect updates in design and lifetime development needs.
H3	Housing Mix and Density	Revision necessary – to reflect on why the policy has not been met and whether the allocation of new development sites will require further clarification within this policy
H4	Affordable Housing	Revision necessary – revised level of housing growth over new plan period in relation to housing requirement and spatial strategy. A review of site viability and previous success of commuted sum requirements.
H5	Affordable Housing Exceptions	Revision necessary –required greater clarification on what is local need.
H6	Sub-division of Curtilages, Infill and Backland Development	Functioning effectively
H7	Annexes to Residential Dwellings	Functioning effectively
H8	Self Contained Accommodation and Houses in Multiple Occupation	Revision Necessary – Whilst an additional SPG has been prepared, appeal decisions are not always supporting the Council's position so a review is considered timely.
H9	Housing Estate Regeneration	Update in line with successful delivery of Alway, Ringland and Pillgwenny Regeneration schemes. Identify specific allocations if required.

H10	Conversions in the Countryside	Functioning effectively
H11	Outbuildings and Extensions to Conversions	Functioning effectively
H12	Replacement Dwellings in the Countryside	Functioning effectively
H13	Extensions to Dwellings in the Countryside	Functioning effectively
H14	Caravans	Functioning effectively
H15	Gypsy and Traveller Transit Accommodation	Revision Necessary – to reflect updated needs assessment.
H16	Gypsy and Traveller Residential Accommodation	Revision Necessary – to reflect updated needs assessment.
H17	Gypsy and Traveller Accommodation Proposals	Functioning effectively

Employment Policies		Commentary
EM1	Employment Land Allocations	Revision Necessary - to assess the long term impact of Covid and how the current shift to home working will impact on employment sites long term. What ancillary facility are appropriate in and employment site?
EM2	Newport Docks	Functioning effectively
EM3	Alternative uses of Employment Land	Revision Necessary - to reflect RLDP growth options and to assess the long-term impact of Covid and how the current shift to home working will impact on employment sites long term. What is defined as commercial leisure developments, clarification on what constitutes “marketing”, consider restricting COU of recently constructed employment sites.

Transport Policies		Commentary
	Transport Policies - General	Amendments required to considered Active Travel and transport hierarchy.
T1	Railways	Functioning effectively
T2	Heavy Commercial Vehicle Movements	Functioning effectively.
T3	Road Hierarchy	Functioning effectively.
T4	Parking	Revision required – to reflect national policy requirements, consider boundaries of parking zones and ULEV charging implications.
T5	Walking and Cycling	Functioning effectively
T6	Public Rights of Way Improvement	Functioning effectively
T7	Public Rights of Way and New Development	Functioning effectively
T8	All Wales Coast Path	Should this be combined with Policy T7?

Retailing and the City Centre Policies		Commentary
R1	City Centre Schemes	Revision necessary - to assess the long term impact of Covid and how the current shift to home working will impact on employment sites long term. What ancillary facility are appropriate in and employment site?
R2	Primary Shopping Frontage	
R3	Non-Retail Uses in Secondary City Centre Shopping Areas	
R4	Non-Retail Uses in Other City Centre Shopping Areas	
R5	Café Quarter	
R6	Retail Proposals in District Centres	A Health check on the centres will be required to highlight any concerns. Clarification as to the application of the needs and sequential test at the local scale is required, as well as reflecting whether the policies are meant for the urban area only.
R7	Non-Retail Uses In District Centres	
R8	Small Scale Retail Proposals	
R9	Change of Use to Non-Retail Uses Inside Local Centres	
R10	New Out of Centre Retail Sites	Revision necessary to all Out of Centre Retail Polices – The level of vacancies, reduction in footfall numbers and pressure for out of town retail remains a concern. Policies to be reviewed to ensure this pressure is managed, as necessary.
R11	Development of Existing Out-of-Centre Retail Sites	

Community Facilities & Other Infrastructure Policies		Commentary
CF1	Protection of Playing Fields, Land and Buildings Used for Leisure, Sport, Recreation and Play	Functioning effectively
CF2	Outdoor Play Space Requirements	Revision of calculations required to reflect revised level of housing growth over new plan period in relation to housing requirement and spatial strategy.
CF3	Water Based Recreation	Consider the need to assess/encourage requirements e.g. lifeboat and leisure access.
CF4	Riverfront Access	Consider the need to assess/encourage requirements e.g. lifeboat and leisure access.
CF5	Usk and Sirhowy Valley Walks	Update to ensure this covers the requirement of PROW strategy
CF6	Allotments	Functioning effectively
CF7	Horse Related Developments	Functioning effectively
CF8	Tourism	Amendments required to consider what is defined as tourism, very permissive at present possible implications from temporary accommodation from housing stock.
CF9	Celtic Manor	Is a specify policy still necessary, can this be incorporated into CF8?
CF10	Commercial Leisure Developments	Amendments required to consider what is defined as commercial leisure developments
CF11	Outdoor Leisure Developments	Functioning effectively

CF12	Protection of Existing Community Facilities	Amendments required to consider what is defined as community facilities and where they are best located or how they can be protected if a private business.
CF13	School Sites	Functioning effectively

Minerals Policies		Commentary
M1	Safeguarding of Mineral Resource	Revision Necessary – AMR highlighted that further training is needed every year. Review whether category 2 minerals should be safeguarded.
M2	Mineral Development	Functioning effectively
M3	Oil and Gas	Question whether this policy goes beyond national policy
M4	Wharves and Rail	Functioning effectively

Waste Policies		Commentary
W1	Sites for Waste Management Facilities	Review to ensure adequate land supply to meet requirements of PPW.
W2	Waste Management Proposals	Review to ensure adequate land supply to meet local requirements.
W3	Provision for Waste Management Facilities in Development	Functioning effectively

Policy Topics noted as missing from the current plan:

- External space for Care Homes
- Guidance on lifetime homes and adaptation of homes strategy.

LDP Consultation

How to respond

This consultation seeks your views on the
**Draft Local Development Plan –
Review Report (2021)**

The closing date for the consultation is
5th March 2021.

You can respond in any of the following ways.

Online

Please complete the online questionnaire on the 'Have your Say' pages of the Newport City Council's website:
www.newport.gov.uk

E-mail

Please complete the consultation response form and send it to:
Ldp.consultation@newport.gov.uk

Post

Please complete the consultation response form and send it to the address below:

Local Development Plan Consultation
Planning Policy
Newport City Council
Civic Centre
Newport
NP20 4UR

Further information and related documents

A Welsh Language version of the document(s) is also available

Contact details

If you have any queries about this consultation, please contact:
Lindsay Christian or Samantha Kremzer
Ldp.consultation@newport.gov.uk
01633 210067/ 01633 851459

To show that the consultation was carried out properly, the Council intends to publish a summary of the responses to this document. We may also publish responses in full. The name of the person or organisation who sent the response are published with the response.

If your details are published as part of the consultation response, then these published reports will be retained indefinitely. Information will be held in accordance with the **Replacement Local Development Plan GDPR Privacy Notice** (Newport City Council) a paper copy provided on request.

You can submit your response instantly by completing the online consultation response form on the following link – Newport.gov.uk/ldp

Alternatively, you can complete and return the following consultation response form:

Consultation Response Form

If you are acting as an Agent please also provide detail of person/organisation you are representing (you will need to supply a separate form for each of the persons/organisations you are representing)

Your details	Agent details if applicable:
Name _____	Name _____
Position _____	Position _____
Organisation _____	Organisation _____
Email _____	Email _____
Address _____ _____	Address _____ _____
Postcode _____	Postcode _____
Tel _____	Tel _____
Preferred method of communication	Preferred method of communication
Email <input type="checkbox"/>	Email <input type="checkbox"/>
Letter <input type="checkbox"/>	Letter <input type="checkbox"/>

Please note that by submitting this form your contact details will be added to our contact list and be informed as to the preparation of the Newport Replacement Local Development Plan. If you have any queries or would like to stop receiving information please contact a member of the team at ldp.consultation@newport.gov.uk or call 01633 65665.

Office use only box

Date Received	Acknowledged	Entered

Question 1 Do you agree that the main issues that should be considered in the full LDP Review have been identified? Yes/No

Comments box

Question 2 Do you agree that the existing LDP vision, issues and objectives remain relevant for a revised Plan? Yes/No

Comments box

Question 3 Do you agree that the adopted LDP Spatial Strategy needs reviewing? Yes/No

Comments box

Question 4 Do you agree with the findings of the LDP policy review? Yes/No

Comments box

Question 5 Do you agree that the LDP needs to be revised? If so, short form or full revision? Yes/No

Comments box

Question 6 Other Comments on the Draft Review Report

Comments box

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LDP Consultation

How to respond

This consultation seeks your views on the
**Draft Local Development Plan –
Delivery Agreement (2021)**

The closing date for the consultation is
5th March 2021.

You can respond in any of the following ways.

Online

Please complete the online questionnaire on the 'Have your Say' pages of the Newport City Council's website:
www.newport.gov.uk

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To show that the consultation was carried out properly, the Council intends to publish a summary of the responses to this document. We may also publish responses in full. The name of the person or organisation who sent the response are published with the response.

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Your details	Agent details if applicable:
Name _____	Name _____
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Organisation _____	Organisation _____
Email _____	Email _____
Address _____ _____	Address _____ _____
Postcode _____	Postcode _____
Tel _____	Tel _____
Preferred method of communication	Preferred method of communication
Email <input type="checkbox"/>	Email <input type="checkbox"/>
Letter <input type="checkbox"/>	Letter <input type="checkbox"/>

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Office use only box	Date Received	Acknowledged	Entered

Question 1 Do you have any comments concerning the draft Timetable for the Replacement Local Development Plan?

Comments box

Question 2 Do you have any comments concerning the draft Community Involvement Scheme for the Replacement Local Development Plan?

Comments box

Question 3 Do you know of any other groups/organisations that should be included in Appendix A – Consultation Bodies?

Comments box

Question 4 Do you have any other comments on the Draft Delivery Agreement

Comments box

Responses are welcome in either English or Welsh and should arrive no later than **5 March 2021**.

You can reply in any of the following ways:

Post:

Planning Policy
Newport City Council
Civic Centre
Newport

Email:

NP20 4UR
ldp.consultation@newport.gov.uk

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Local Development Plan Draft Review Report

December 2020

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1. EXECUTIVE SUMMARY

Purpose of the Draft Review Report

- 1.1** Local Planning Authorities (LPA) have a requirement to keep their development plans up to date and consider the need for review either through their Annual Monitoring Report (AMR) or having reached 4 years post adoption of the Local Development Plan (LDP). The Newport AMR 2020 made a recommendation, and the Council has subsequently agreed, to begin the review and process of undertaking a replacement LDP.
- 1.2** Changes to an adopted LDP can only be made through formal plan revision. The first stage is to produce a Review Report (RR), which will be a key part of the evidence base underpinning the form and content of the revised plan and submitted to the Inspector for examination. There are two revision routes available to choose from when looking how to revise an LDP. Firstly there is a Full Revision of the plan following the same procedures as used in preparing the adopted plan, or secondly, the Short Form Revision procedure where the parameters to be considered are very much more focussed and limited in scope, as evidenced through the RR.
- 1.3** The importance of this Review Report to the LDP process means that it is essential that it is subject to consultation. This will ensure that it forms a thorough and robust approach to the creation of a Replacement LDP for Newport. Following consultation, the report will be updated reflecting the comments received setting out the potential implications for both the content of the plan and the review process i.e. full plan revision or short form revision.

Consultation

- 1.4** The Council is seeking stakeholder views on the matters set out in this Draft Review Report. Views are sought on the issues that should be considered in the full review of the LDP, together with the subsequent potential changes required to the LDP, as set out in Chapters 5 and 6 of this report.
- 1.5** Stakeholders are invited to comment on/suggest any additional issues and/or changes that should be considered in the full review of the LDP. Any comments should be supported by evidence. Opinions are also sought on whether the changes identified would warrant a short form or full revision to the LDP, as set out in Chapter 8.
- 1.6** A consultation response form is available to complete on the Council's website at www.newport.gov.uk/ldp, copies or can be requested from the team by emailing ldp.consultation@newport.gov.uk. **Comments will need to be submitted by XXX 2021**

2. INTRODUCTION

- 2.1** The Newport Local Development Plan (LDP) was adopted by the Council on 27 January 2015 and sets out the Council’s planning framework for the development and use of land in Newport over the period 2011 – 2026. In accordance with statutory requirements, the LDP has been monitored on an annual basis with five Annual Monitoring Reports (AMR) published to date¹.
- 2.2** To ensure that LDPs are kept up-to-date, local planning authorities are required² to commence a review of their plans at least once every four years following plan adoption, or sooner if the findings of the AMRs indicate significant concerns with a plan’s implementation. This draft Review Report (RR) sets out the finding of the review³, setting out the proposed extent of likely changes to the existing LDP and seeks to confirm the revision procedure to be followed in preparing a replacement LDP (RLDP).
- 2.3** The draft Review Report is structured as recommended in national guidance and contains the following sections:
- 2.4** **Chapter 3** details the key legislative, national and local policy changes and evidence base that have occurred since the adoption of the LDP in 2015 which are important considerations to inform the review of the LDP.
- 2.5** **Chapter 4** provides a summary of the main findings of the past five Annual Monitoring Reports (AMR), outlining the associated implications for review of the LDP.
- 2.6** **Chapter 5** provides an assessment of the current LDP and sets out the potential changes in terms of the Vision and Objectives, Development Strategy and Policies to inform the review process.
- 2.7** **Chapter 6** considers the areas of evidence base that would need to be reviewed/updated in preparing a RLDP.
- 2.8** **Chapter 7** considers the potential options for review of the LDP and opportunities for collaboration.
- 2.9** **Chapter 8** provides a conclusion on the appropriate form of plan revision and outlines the next steps.

¹ Available to view at: <http://www.newport.gov.uk/en/Planning-Housing/Planning/Planning-policy/Local-Development-Plan/LDP-monitoring-reports.aspx>

² Town and Country Planning (LDP) (Wales) Regulations 2005, as amended: S.41

³ Required under Section 69 of The Planning and Compulsory Purchase Act 2004

3. INFORMING THE LDP REVIEW

- 3.1. The Council must consider contextual changes since the adoption of the LDP. This includes changes to national, regional, and local policies, legislation and strategies that will have implications for the RLDP. The most significant of these changes are set out below.

LEGISLATIVE CHANGES

Planning (Wales) Act 2015

- 3.2 The Planning (Wales) Act received Royal Assent in July 2015 and came into force in stages between October 2015 and January 2016. It sets out a series of legislative changes to deliver reform of the planning system in Wales, to ensure that it is fair, resilient and enables development. The Act addresses 5 key objectives which includes strengthening the plan-led approach to planning. The Act strengthens the plan led approach and introduces a legal basis for the preparation of a National Development Framework (NDF) and Strategic Development Plans (SDP).
- 3.3 It is a statutory requirement for Welsh Ministers to produce a National Development Framework. The NDF, renamed Future Wales: the National Plan 2040, will replace the Wales Spatial Plan and will set out land use priorities and a land use framework, concentrating at the nationally significant scale, for Strategic and Local Development Plans. The NDF has been laid in the Senedd and is undergoing a scrutiny period and is anticipated to be published in February 2021; how this impacts on Newport is set out below.
- 3.4 The key impact on Local Development Plans from the introduction of NDF and SDP is the need to consider a review of the LDP once the NDF and SDP are published or adopted to ensure all land use plans are consistent.

The Town and Country Planning (Local Development Plan) (Wales) (Amendment) Regulations 2015

- 3.5 Amendments to The Town and Country Planning (Local Development Plan) (Wales) Regulations 2005 were carried out in response to the outcome of the LDP refinement exercise and aims to simplify certain aspects of the LDP process. The amended Regulations remove the statutory requirement to advertise consultation stages in the local press; allowing local planning authorities to make revisions to the LDP where the issues involved are not of sufficient significance to warrant the full procedure, without going through the full revision process; eliminate the need to call for, and consult on, alternative sites following the deposit consultation; and make minor and consequential amendments.
- 3.6 The amended LDP Regulations came into force on 28 August 2015 and together with the related policy and guidance in Planning Policy Wales (PPW). Edition 10, and the revised LDP Manual (Edition 3), aim to make the LDP process more efficient and effective (i.e. enabling swifter plan preparation and revision without imposing unnecessary prescription). The amended Regulations will need to be considered in relation to any Plan review and will be given further consideration as necessary.

Well-being of Future Generations (Wales) Act 2015

- 3.7 The Act is about putting sustainable development at the heart of Government and public bodies. This is to be achieved by improving the social, economic, environmental and cultural well-being of Wales. The Act requires public bodies to consider the long-term, to work with people and communities and each other, look to prevent problems and take a more joined-up approach; through the application of seven well-being goals. Newport has produced its Local Well-being Plan as required which has replaced the Single Integrated Plan (SIP). This Act will require LDPs to consider the outcome of the Well-being Plan in the future rather than the SIP which is currently given regard. Sustainability is a core principle of the LDP and there will be clear links between the LDP and Well-being Plan.

Environment (Wales) Act 2016

- 3.8 The Environment (Wales) Act received Royal Assent in March 2016 and sits alongside both the Planning (Wales) Act 2015 and the Well-being of Future Generations (Wales) Act 2015 in promoting the sustainable use, management, and development of Welsh resources. The Environment (Wales) Act introduces new legislation for the environment and provides an iterative framework which ensures that managing Wales' natural resources sustainably will be a core consideration in decision-making. The Act also requires Welsh Government to produce a Natural Resources Policy that sets out the priorities, risks, and opportunities for managing Wales' natural resources sustainably, as detailed below.

Historic Environment (Wales) Act 2016

- 3.9 The Historic Environment (Wales) Act 2016 received Royal Assent in March 2016. The Act has three main aims: to give more effective protection to listed buildings and scheduled monuments; improve the sustainable management of the historic environment; and introduce greater transparency and accountability into decisions taken on the historic environment. The Act provides effective protection to listed buildings and scheduled ancient monuments; it improves the sustainable management of the historic environment and introduces greater transparency and accountability into decisions taken on the historic environment. The Act will also form the core of an integrated suite of legislation, policy, advice and guidance which together will provide a flexible and effective system for the sustainable management of the Welsh historic environment, reflecting current conservation principles and practice. The LDP sets out locally specific policies and has not sought to repeat national policy and will ensure that any changes to conservation practice are reflected where necessary in a replacement plan.

Public Health (Wales) Act 2017

- 3.10 The Public Health (Wales) Act 2017 received Royal Assent in July 2017. The Act makes changes to the law in Wales to improve health and prevent avoidable health harms. Some of the relevant changes in the Act include the production of a national strategy on preventing and reducing obesity and a requirement to undertake Health Impact Assessment (HIA) on key decisions including Local Development Plans shall be undertaken part of the Sustainability Appraisal.

NATIONAL PLANNING POLICY/ PLANS

National Development Framework

- 3.11 The Welsh Government has committed to produce a National Development Framework (NDF) which will be the highest tier of development plan in Wales. The NDF, also known as ‘Future Wales: The National Plan 2040’, sets out the 20-year spatial framework for land use in Wales, providing a context for the provision of new infrastructure/growth. It will concentrate on development and land use issues of national significance which the planning system is able to influence and deliver. The draft NDF was put out for public consultation from 7 August until 15 November 2019 and more recently the NDF was laid before the Senedd for scrutiny and is anticipated to be published in February 2021.
- 3.12 The draft NDF identified Newport as a Centre of National Growth. The Policy 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 region. It goes on to state that Strategic and Local Development Plans across the region should recognise Newport as a focus for strategic housing and economic growth; essential services and facilities; transport and digital infrastructure; and consider how they can support and benefit from Newport’s increased strategic regional role. 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 and the wider region. The inclusion of Newport as a Centre of National Growth is a significant boost for the city.

Welsh National Marine Plan

- 3.13 The Welsh National Marine Plan (WNMP) was adopted on 12 November 2019. It is the first marine plan for Welsh seas and covers the inshore and offshore marine plan areas for which Welsh Ministers are the marine planning authority. The WNMP sets out the Welsh Minister’s policies for the sustainable development of Wales’ seas. The Plan will help manage increasing demands for the use of our marine environment, encourage and support the economic development of marine sectors at appropriate locations and incorporate environmental protection and social considerations into marine decision-making. Due to Newport’s coastal location, the next version of the LDP will need to fully consider the adopted WNMP.

Planning Policy Wales (Edition 10) and Technical Advice Notes

- 3.14 Since the LDP was adopted in January 2016, Welsh Government have revised Planning Policy Wales three times; the current version is Edition 10 which was published in December 2018. PPW was re-drafted so that the seven well-being goals and five ways of working of the Well Being of Future Generations Act 2015 is fully integrated into policy. It also puts the concept of placemaking into the heart of national planning policy in order to ensure that planning decisions consider all aspects of well-being and deliver new development which is sustainable and provides for the needs of all people.

3.15 Since the adoption of the LDP, the following changes have been made to Technical Advice Notes (TAN) in Wales:

- TAN 1: Joint Housing Land Availability Studies was revoked by WG in March 2020.
- TAN 4: Retail and Commercial Development was updated in November 2016.
- TAN 11: Noise. There was a call for evidence made in early 2020 to support the review of the TAN to include air quality and soundscape. Clean Air Plan for Wales - Healthy Air, Healthy Wales.
- TAN12: Design was updated in March 2016.
- TAN 14: Coastal Planning was recently updated, and consultation responses are being reviewed.
- TAN 15: Development and Flood Risk consultation was recently updated, and consultation responses are being reviewed.
- TAN 20: Planning and the Welsh Language updated in October 2017.
- TAN21: Waste updated in February 2017.
- TAN 24: The Historic Environment was produced in May 2017.
- Current work is being undertaken on reviewing intensive agriculture.

Local Development Plan Manual, Edition 3

3.16 The Development Plans Manual, Edition 3, was published on 26 March 2020. The Manual is a reference document for practitioners who are responsible for, or contribute to, the preparation and implementation of development plans. It contains practical guidance on how to prepare, monitor and revise a development plan, underpinned by robust evidence to ensure that plans are effective and deliverable and contribute to place-making, as defined in national policy set out in PPW. The Manual incorporates lessons learned to date, best practice in resolving issues and how to 'de-risk' plans through the preparation of a robust and focussed evidence base. The Manual clarifies the expectations of Welsh Government about the plan making process. This will be one of the key reference documents for the progression of a revised LDP.

Natural Resources Policy

3.17 In line with the Environment (Wales) Act 2015 the Welsh Government produced a Natural Resources Policy (NRP) in August 2017. The focus of the NRP is the sustainable management of Wales' natural resources, to maximise their contribution to achieving goals within the Well-being of Future Generations Act. The NRP sets out three National Priorities: delivering nature-based solutions, increasing renewable energy and resource efficiency, and taking a place-based approach. The NRP also sets the context for Area Statements (AS), which have been produced by Natural Resources Wales (NRW) (see below), ensuring that the national priorities for sustainable management of natural resources inform the approach to local delivery. Local Planning Authorities must have regard to the relevant Area Statement in Local Development Plans.

The National Strategy for Flood and Coastal Erosion Risk Management in Wales

3.18 In line with the Flood and Water Management Act (2010), Welsh Government has produced its second national strategy on flood and coastal erosion risk management (FCERM) (October 2020). The strategy sets out how the Government intend to manage the risk and sets objectives and measures of all partners, including NCC, for the next ten years. A replacement LDP will need to recognise the risk and provide a policy framework which looks to prevent exposure to risk which will be informed by the anticipated Wales Flood Map.

Wales Transport Strategy

3.19 The WG have recently begun consultation for a new Wales transport strategy: a vision for transport in Wales (November 2020). The overarching vision for the strategy is to achieve ‘An accessible, sustainable transport system’. The WTS is a statutory document required by the Transport (Wales) Act 2006 (The Act). The strategy covers all modes of transport, setting out the government’s strategic priorities and desired outcomes, providing a link to wider priorities as well as plans at the local authority level. The development of this strategy will have a clear impact on a replacement LDP.

REGIONAL CONTEXT

Strategic Development Plans (SDP)

3.20 The aim for the SDP is to address regional factors such as housing, employment and transport across the region. It is anticipated that Newport will be part of an SDP area which shall be in alignment with the emerging Cardiff Capital Region (CCR) City Deal proposals. LDPs will continue to have a fundamental role in the plan led system. The Welsh Government are currently consulting on the regulations for the establishment of Corporate Joint Committees (CJC) as well as the subordinate legislation for the procedure to produce SDPs in Wales. The CJC will be responsible for delivering strategic planning and therefore it is expected progress on the South East Wales Strategic Development Plan will occur post consultation in 2021.

Cardiff Capital Region and City Deal

3.21 The UK Government has agreed to a 1.2bn City Deal for the Cardiff Capital Region in partnership with the Welsh Government and ten Local Authorities, including Newport City Council. As set out in the report ‘Powering the Welsh Economy’, the Cardiff Capital Region is intended to encourage the ten local authorities and other key partners in its boundaries to work together and collaborate on projects and plans for the area. This includes investment in the regions infrastructure, creation of a non-statutory Regional Transport Authority, development of capabilities in compound semiconductor applications, creation of Skills and Employment Board, future employment support, Regional Business Organisation and commitment to a partnership approach to housing and regeneration. The authorities forming the Capital Region are continuing to work on a City Deal bid to fund projects aimed at boosting the competitiveness of the region over the next 20 years. The progression of the Cardiff Capital Region agenda, City Deal Bid and any subsequent implications for the LDP will be given further consideration.

Western Gateway

- 3.22 The Western Gateway is a recently established strategic partnership that aims to deliver an economic powerhouse that will drive growth on both sides of the Severn. As an equal partner, Newport is expected to be a key player in the success of the Western Gateway and capitalise on the benefits of greater collaboration. In November 2019, the Western Gateway was formally launched as a strategic partnership promoting and maximising economic growth across South Wales and the West of England to create jobs, boost prosperity and support the universities and businesses of the region.
- 3.23 The strengths associated with working in partnership with authorities in the Western Gateway will need to be fully capitalised on with the creation of the RLDP.

Area Statements

- 3.24 Natural Resources Wales is required to prepare Area Statements (AS) under section 11 of the Environment (Wales) Act, 2016. These Area Statements are developed to help facilitate the implementation of the National Natural Resources Policy (NRP) and build on the evidence set out in the State of Natural Resources Report (SoNNAR). The South East Wales Area Statement (SEWAS) was published on 1 April 2020. It has taken a landscape scale approach considering where and why we want to build ecosystem resilience in terms of the special and distinctive landscape areas of South East Wales. The SEWAS has been produced to inform planning and helps stakeholders consider different ways of working together to meet the four strategic themes:
1. **Linking our landscapes** – identifying local opportunities for protected sites, natural and built environments to contribute towards resilience of wider priority habitat networks in the region.
 2. **Climate Ready Gwent** – identifying landscape and regional scale opportunities and collective interventions for climate adaptation and mitigation which enhance local ecosystems and community resilience.
 3. **Healthy Active Connected** – identifying opportunities and collaborative interventions that protect and improve health and wellbeing.
 4. **Ways of Working** – identifying the benefits of strategic regional collaboration and identifying that we need to do at a regional scale to maximise local delivery and natural resource benefits.
- 3.25 The replacement Local Development Plan is required to have regard to and be consistent with this SEWAS and this will be judged against a test of soundness at examination.

NEIGHBOURING LPAs

- 3.26 Considering the exceptional circumstances being experienced through the Covid-19 pandemic, progressing an LDP in line with agreed Delivery Agreements has been a challenge. Technical work has been progressed by LPAs, but a revised Delivery Agreement is required to agree a new way forward for RLDP preparation. The stage to which our neighbouring authorities reached pre Covid-19 is set out below.
- 3.27 **Cardiff City Council** adopted their LDP on 28 January 2016. The LDP has a plan period of 2006-2026. Following the fourth year of adoption the Council began the review of the LDP. The Review Report and Delivery Agreement were put out for public consultation in early 2020 but due to the impact of Covid 19, both are being in the process of being updated and due for consultation early 2021.
- 3.28 **Caerphilly County Borough Council** adopted their LDP on 23 November 2010. The LDP has a plan period of 2006-2021. Following consideration of the second AMR (2013) the Council resolved to commence work on the Review of the LDP. The deposit Replacement LDP occurred early 2016 but on 11 October 2016, following receipt of objections from Welsh Government, the Council resolved to withdraw the RLDP. On 23 October 2019 the Council agreed to commence work on a full revision of the adopted LDP and have produced a new draft review report. The next stage is the consultation of an updated Delivery Agreement (reflecting the Covid situation) which is due early 2021.
- 3.29 **Torfaen County Borough Council** adopted their LDP in December 2013. The LDP covers the period 2013-2021. Torfaen Council resolved to review the LDP in 2017. Work on the RLDP began on 10 March 2020 following approval of their DA. The Council have drafted their Preferred Strategy and a revised DA (due to Covid) and will need to begin their consultation on these documents when possible.
- 3.30 **Monmouthshire County Council** adopted their LDP on 14 February 2014. The LDP has a plan period of 2011-2021. Monmouthshire Council resolved to review the LDP in 2017. Work on the RLDP began on 14 May 2018 following the approval of their DA from WG; the plan period for the RLDP is 2018-2033. The publication of the WG population and household projections have meant that the Council has had to revisit both the Growth and Spatial Options and Preferred Strategy stages of the RLDP process. An updated DA has been agreed by Welsh Government in October this year and work will progress in line with this new timetable.

LOCAL CONTEXT

Newport Local Well-Being Plan

- 3.31 Under the provisions of the Well-Being for Future Generations Act, a Public Service Board (PSB) must be set up for each Local Authority in Wales. Newport established the One Newport PSB, and this partnership published the Local Well-Being Plan for Newport⁴ on 1 May 2018.

⁴ <http://www.newport.gov.uk/documents/One-Newport/Local-Well-being-Plan-2018-23-English-Final.pdf>

3.32 The Well-Being Plan sets out the PSBs priorities and actions for the period 2018-2023. Firstly, the Plan takes the seven Well-Being goals and has set out thirteen priorities. Four well-being objectives have then been developed to deliver against the Well-Being goals and priorities; these are:

- 1) **People feel good about living, working, visiting, and investing in Newport**
- 2) **People have skills and opportunities to find suitable work and contribute to sustainable economic growth**
- 3) **People and communities are friendly, confident, and empowered to improve their well-being**
- 4) **Newport has healthy, safe, and resilient environments**

3.33 Finally, five integrated interventions have been agreed to ensure the priorities were tackled in a targeted and focussed manner. The five interventions all have some direct or indirect influence over the development plan process; they are:

- **The Newport “Offer”** – the complete package of a desirable city to live and work.
- **Strong Resilient Communities** – taking a preventative place-based approach.
- **Right Skills- Access** - to skills and education that align with employment opportunities.
- **Green and Safe Spaces** –greener, healthier, and safer place with equal access to quality space.
- **Sustainable Travel** – efficient, safe, and accessible transport with low impact on environment.

3.34 There has been annual reporting on the Newport Well-Being Plan since its publication and a review is currently being undertaken. There is a requirement for a Well-Being Plan to be published no later than one year after the date of each ordinary election to the local authority, which is May 2022. The work for the next well-being plan will overlap with the development of the RLDP and a collaborative relationship between the two processes will be maintained. This will ensure that the RLDP has had regard to the Well-Being Plan as they are both developed. The Well-Being Plan is recognised as a fundamental part of the evidence base for development plans as set out in Planning Policy Wales.

Corporate Plan

3.35 The Newport Corporate Plan (2017-2022) sets out how the Council will build on successes and Build a Better Newport. The plan sets out how this will be done by focusing on jobs and the economy, education and skills, fairness and equality, community safety and cohesion, the environment, transport, culture, and social well-being. The four commitments set out in the plan, Resilient Communities, Thriving City, Aspirational People and Modernised Council, each have aspects that will influence and direct the focus of a RLDP. This impact from the plan can

been seen in land use terms through focussing on achieving Council asset transfers, meeting the city's dementia friendly status, focusing on increased SME development in the City, dealing with parking problems, new waste facilities, improved or new education and skill facilities, meeting social care capacity requirements and delivering neighbourhood service hubs.

3.36 The corporate plan is supplemented by three relevant corporate strategies – Digital Strategy, Strategic Equality Plan and Welsh Language Strategy. The Digital Strategy (2015-2020), currently under review, sets out how the Council will enable connectivity and increase access to service. The focus is for Newport to become a digital city which empowers its citizens, customers, and business through the innovative use of digital services. The Strategic Equalities Plan (2020-2024) will be an integral piece of information for the Integrated Assessment work undertaken for a RLDP. The Welsh Language Strategy (2017-2022) sets out a vision that 'the people of Newport can use Welsh in all parts of life'. The RLDP will take the aims of this strategy into account when undertaking its language impact assessment, and when engaging on plan preparation, as well as the direct land use implications e.g. provision of welsh language schools.

3.37 The Council has recently signed up to the **Placemaking Wales Charter**; by signing up to the Wales Placemaking Charter the Council pledges to:

- Involve the local community in the development of proposals
- Choose sustainable locations for new development
- Prioritise walking, cycling and public transport
- Create well defined, safe, and welcoming streets and public spaces
- Promote a sustainable mix of uses to make places vibrant
- Value and respect the positive distinctive qualities and identity of existing places.

3.38 In addition, the Council has also signed up to the **Healthy Travel Charter** for Gwent. This charter commits those twenty-one leading public sector organisations in Gwent to support and encourage staff to travel in a sustainable way to and from work. Through 15 ambitious commitments, the charter promotes walking, cycling, agile working and the use of public transport and ultra-low emission vehicles. The aim is to increase sustainable journeys made to and from workplaces, reducing the impact on the environment and improving health in Gwent for current and future generations.

Other Council Plans and Strategies

3.38 The national and regional context has seen much change, and this is reflected within the Council's own work programme. There are several relevant plans and strategies created since the adoption of the LDP which will provide an updated or new approach to local matters. A summary of the most relevant plans and strategies is set out below:

3.39 **The Newport Economic Growth Strategy (EGS)** adopted in 2015, commits to a ten-year vision and framework for building Newport's economy. Since 2015, Newport has become a more competitive city with a growing influence in high value sectors. We have developed a

multitude of training and development routes for future workers and the City is experiencing a rapidly expanding tourism sector. Newport now has a pivotal role in the success of both the Cardiff Capital Region and Western Gateway Partnerships and as an organisation we are embracing new ways of working. The Economic Growth Strategy, refreshed in February 2020, was updated to ensure that Newport is maximising opportunities to enable and facilitate growth as well as complimenting the ongoing physical regeneration of the City. A **recovery addendum (2020)** for the EGS was produced by the Council in June 2020 to set out how the Council will support the city's economic stability and growth in the wake of the coronavirus pandemic.

- 3.40 **The Newport City Centre Masterplan (2019 – 2029)** sets out the Council's strategic framework for City Centre regeneration. This was updated in 2019 to reflect the progress made to date and a new vision and set of priority projects was been approved.
- 3.41 The requirements of the **Active Travel Act 2013** have meant the Council has undertaken a series of existing and integrated Route Maps; this will provide a new evidence base for RLDP work on sustainable travel matters. There is a clear role set out for the planning system to facilitate active travel, and the RLDP will need to consider the outputs of the legislative requirements of the act. This national action plan sets out the Welsh Government vision and how this cultural shift towards prioritising active travel is undertaken e.g. through developments, planning policy, planning obligations etc.
- 3.42 **The Waste Strategy for Newport (2019-2025)** was adopted in February 2020 and this sets out the objectives, action plans and monitoring programme to ensure all elements linked to improved recycling are strategically driven and robustly monitored. A land use based action includes the provision of new facilities such as Household Waste Recycling centres.
- 3.43 **The Biodiversity and Resilience of Ecosystems Duty Report 2019** is a requirement of the Environment (Wales) Act 2016 and it outlines how the organisation has addressed its biodiversity duty and consequently achieves it Well-being objectives and Nature Recovery Plan objectives. The report shows a positive approach and highlights those projects and ambitions for future working that can provide evidence and relevant input to a new RLDP. An aim of the Council, and PSB, is to develop a Newport-wide **Green Infrastructure Plan**. Such a plan and the evidence behind it will be a key informative for a replacement LDP and satisfy the requirement of Planning Policy Wales for such an assessment.
- 3.44 Newport has 11 **Air Quality Management Areas (AQMA)** and since the LDP was adopted an SPG has been developed to ensure that air quality impacts are adequately dealt with through the planning application regime. The work being undertaken by WG on revising Technical Advice Note 7 and the new development allocations within a RLDP means that the plan will need to consider the impact on air quality at the strategic scale. An Air Quality Action Plan will be developed by the Council and work related to this will inform a RLDP. The recent publication of the **Clean Air Plan for Wales: Healthy Air, Healthy Wales (2020)** clearly

establishes this topic as a concern. A RLDP will consider its impact and the role planning can take in assisting in tackling the causes of poor air quality.

- 3.45 Flood risk is a key concern for the Newport area, and one type of water management that the planning system can influence is the **Sustainable Drainage (SuD)** solution for new developments. The Flood and Water Management Act (2010) established the creation of **Sustainable Drainage Approval Body (SAB)** in local authorities. The legislation gives those bodies statutory responsibility for approving and in specified circumstances, adopting the approved drainage systems. From 7 January 2019, all new developments of more than 1 dwelling house or where the construction area is more than 100m², require SuDs for surface water. From this date onwards, SuDs on new developments must be designed and built in accordance with Statutory SuDs Standards and must be approved by the local authority SAB before construction work begins. This clearly has an impact on development requirements and future flood assessment work undertaken for the RLDP.
- 3.46 **Newport Destination Management Strategy and Action Plan** recognises Newport’s strengths and addresses Newport’s weaknesses as a destination, identifying key actions needed to improve the visitor experience, as well as on-going actions which underpin this. Tourism is vital to Newport’s economy, which has seen a transformational shift in jobs from heavy industry and manufacturing to jobs in the public sector and service industries, of which tourism is a crucial sector representing about 5 % of the total workforce. The importance of sports and tourism and events to Newport continues to increase with the draw of the Newport International Sports Village, National Velodrome, improved Rodney Parade facilities, the International Convention Centre, and the Ryder Cup venue at the Celtic Manor. The importance of such events was clearly set out in the adopted LDP strategy.

2018 Based Population and Household Projections

- 3.47 The Office of National Statistics published the 2018-based local authority population projections on 27 February 2020. These were subsequently republished on 11 June 2020 revising an error discovered in the February data release. The projections provide an indication of the possible size and age structure of the population in the future for local authorities in Wales for the period 2018 to 2043. Newport has the highest projected increase in population of 5.1% over these years. Similarly, the 2018-based local authority household projections were published on 27 February 2020. The projections provide an indication of the future number of households and their composition in Wales. Again, Newport has the largest increase in households by 6.9%. These projections will form the basis of analysis for a revised LDP for Newport.

COVID 19 PANDEMIC

- 3.48 The Covid-19 health emergency has posed significant and unprecedented challenge and its impact on businesses and societal norms is still not clear. The role of planning to aid any economic and social recovery will need to be considered in the evidence base for any

replacement LDP. Of note is the fact that the Coronavirus pandemic has had a massive impact on the way people work, travel, use open green space etc. It has also had an impact on terms of the reduction in the delivery rates of dwellings, and development in general, and we inevitably expect to record lower completions in 2020; we are hopeful that from 2021 and beyond, delivery rates will improve. The Council has set out its strategic recovery aims which outline how we shall continue to build a better Newport. This work has resulted in an addendum to the Economic Growth Strategy that sets out how business are being supported during this crisis (see above). Planning has a role to play in dealing with the impacts of this pandemic and this will be reflected in a replacement plan.

Building Better Places (July 2020)

- 3.49 The Welsh Government published ‘Building Better Places: Placemaking and the Covid-19 Recovery’ in July 2020. The document sets out the planning policy priorities to assist in acting in the recovery period after the Covid-19 pandemic. The objective is that the planning system is centre stage in the consideration of built and natural environment issues that have arisen from the pandemic. The paper highlights the existing policies and tools to use for planners towards their aim of better places to live work and relax in. The importance of our environments has been emphasised through this crisis and although the system should do all it can to support economic recovery, this is not to be at the expense of environmental and social factors; the placemaking agenda is to be embraced by all involved in the planning system. This clarification is welcomed and will inform the focus of how to approach the impact on the pandemic in a future LDP.

4. AMR KEY FINDINGS

- 4.1 As advised in the LDP Manual, a plan review should, amongst other things, draw on the findings of published Annual Monitoring Reports (AMRs). The most recent AMR for Newport was published in October 2020 and covers the period 1 April 2019 – 31 March 2020.
- 4.2 Overall, the LDP has made positive impacts and the policy framework has been effective in achieving truly sustainable development. The table below sets out a summary of the past five AMRs, this is followed by a quick overview of the assessments and recommendations of each AMR.

Indicators	2016	2017	2018	2019	2020
Contextual					
Positive	2	1	3	3	1
Mixed	1	0	0	1	0
Negative	1	3	1	0	3
Core and Local					
Positive	21	16	17	19	16
Training Required	6	7	5	5	6
SPG required	0	0	0	0	0
Further Research	7	12	13	11	13
Policy Review	1	0	0	0	0
Plan Review	0	0	0	0	0
Sustainability Appraisal					
Sig Positive	37	44	53	41	44
Mix effects	18	30	22	34	29
Sig Negative	0	4	2	1	2
No data/ baseline	29	6	7	8	9

- 4.3 Baseline for monitoring was set in the **2016 AMR**. It concluded that overall significant progress was made particularly regarding housing growth and the strategy was being achieved. Employment land delivery was progressing but not at the predicted rate. No indication that a full or part review was required.
- 4.4 For the **2017 & 2018 AMRs** the conclusion was again, significant progress was being made with specific reference to housing growth. Also, the strategy, key aims and objectives were being realised. Research on topics including retail, flood risk and delivery of Gypsy and Traveller accommodation were noted as well as concern raised over the loss of community facilities, decreasing city centre footfall and lack of progress on the number of Air Quality Management Areas. The strategy, key aims and objectives were being realised and there was no indication for a full or partial review of the LDP.

- 4.5 The **2019 AMR** concluded that significant progress was still being made particularly in reference to housing growth and delivery of employment land. The Strategy, aims and objectives were still being fulfilled. Flood risk and the provision of Gypsy and Traveller transit accommodation were again noted. The LDP was coming up to its fifth anniversary (January 2020) and reference was made to the requirement to review every four years. In particular, the success of allocated housing sites means that there is a need for further allocations. This was the first time SDP was noted which would also trigger a LDP review. It was concluded that discussions with Members and WG would begin on the need for a review.
- 4.6 Finally, the **2020 AMR** concluded for the fifth year that significant progress is being made particularly in reference to housing growth and delivery of employment land. The Strategy, aims and objectives are still being fulfilled. City Centre Footfall levels, flood risk and gypsy and traveller transit accommodation were again noted. Access to local services and facilities have been highlighted and the need for additional residential sites was acknowledged. It was also noted that Welsh Government officers recommended that a review is undertaken as we have clearly passed the four-year threshold. In addition, the NDF is on its way and will have clear consequences for the Newport area. The role planning can play in economic recovery following Covid is also key. Therefore, the AMR recommendation was for a formal review of the LDP to be undertaken. This review report is the first stage in moving towards a replacement LDP.

Continuing good practice

- 4.7 The policy framework of LDP has been successful in many ways including: delivering its brownfield strategy; housing supply has predominantly been delivered on allocated sites; there is a clear policy framework to encourage renewable energy schemes; no objections from Welsh Water; Newport is meeting its job creation targets; trees and woodlands are being protected and the Council is meeting and exceeding waste targets.
- 4.8 The Sustainability Appraisal has predicted significant positive effects from the implementation of the LDP including: achieving good levels of access to natural greenspace from new residential development; water pollution has not been identified as a concern; electricity consumption per household is reducing. There has been no loss of Public Rights of Way, SINCS, greenfield land, loss of woodland, loss of valuable agricultural land, unless the losses have been in accordance with LDP policies. No objections from policy architectural officer; increase in welsh medium education; increased use of rail and the affordable housing delivered in the plan period has met National Design Standards.
- 4.9 It is important to understand the successes made to date to ensure the policy framework remains robust and effective.

AMR Topics for further investigation

4.10 There are inevitably topics which deserve a particular focus to reflect on their impact and provide a clear steer not only for the level of review required for the LDP but providing an overview of key issues for a replacement LDP to consider.

Housing Delivery

4.11 The housing delivery rates achieved since the adoption of the LDP have been impressive and Newport is one of the few authorities in Wales to achieve a consistent 5-year land supply of housing. Figure 1 below illustrates the housing delivery achieved to date.

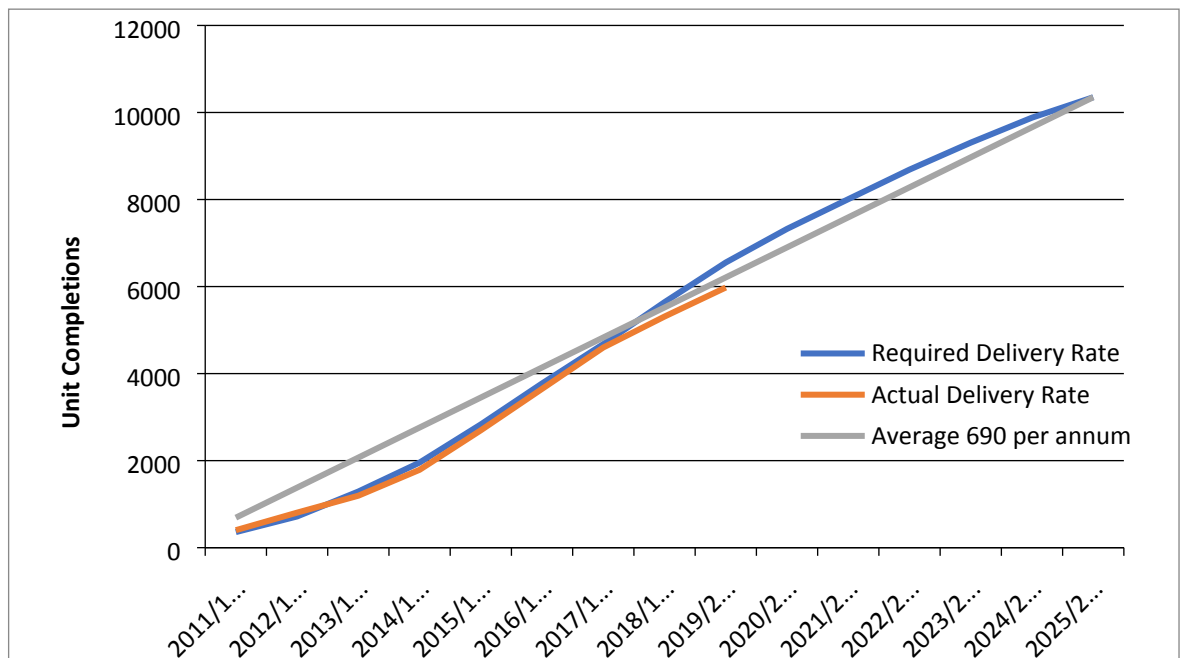


FIGURE 1: LDP HOUSING DELIVERY

4.12 On reflection, the data illustrates that 86% of housing delivery has been delivered on LDP housing allocated sites, with the highest level of windfall completions occurring in the sixth year of the plan. It is possible the reliance on windfall sites will increase as allocated sites are completed, reducing clarity for developers, and undermining the plan-led approach. In addition, 94% of housing has been delivered on previously developed land, consistent with LDP strategy. To deliver sustainable development, the focus on previously developed sites will be recommended where possible.

4.13 The LDP has two strategic housing sites which have been subject to specific monitoring. Both sites are progressing and remain an important supply of housing for the Council, albeit that the rate of delivery has been below that agreed in the LDP. The need for specific allocations and monitoring details will be considered as part of any new LDP.

- 4.14 It is not clear whether future levels of growth can be accommodated predominantly on previously developed land over the next plan period. In addition, the NDF highlights Newport as an area for national growth and this will clearly impact on the level of land requirements. The 2018 population projections and household projections show that Newport have the highest level of growth nationally. The need for integration of employment and housing will also place a pressure on the take up of brownfield land from other uses. The impact from Covid 19 on build rates is yet to be quantified but we are predicting healthier rates from 2021 which mean we remain in a strong position to hit the LDP requirement by the end of the plan period. The success of the allocated housing sites means that with the current completion levels and clear progression of many other allocated sites. This does means that new sites will need to be found to continue this successful achievement to ensure a sufficient housing land supply is maintained.

Affordable Housing

- 4.15 There has had an outstanding result in terms of having currently delivering 94% of the affordable housing target for 2015-2020. This reflects the increased level of Registered Social Landlord schemes within Newport. The LDP target reflected a realistic provision anticipated from the planning process. That is to say that the affordable housing target was not a direct reflection of all housing need for Newport. This level of need is acute, and the planning system remains one route to providing a supply to meet the demand. Therefore, an assessment of housing need, linked to the previous section on housing delivery, is required and this will provide an updated analysis of housing need for Newport.
- 4.16 The allocation of new sites, consideration of submarket areas, policy thresholds and impacts on viability will all serve to ensure a future LDP is based on up to date evidence. Monitoring has illustrated that further research on this matter is required because in practice, the level of contributions does not meet that required by policy. It is therefore key that work is undertaken on this matter to ensure that appropriate percentages are set to reflect the increased house prices and up to date build costs.

Gypsy and Traveller Transit

- 4.17 The LDP has provided a residential Gypsy and Traveller site which covers the identified need set out in the GTAA for the plan period. The GTAA process is ongoing and a future LDP will need to consider if an updated assessment identifies any further need for such accommodation. This assessment also considers the need for transit accommodation, not yet delivered by the current LDP. The introduction of the SDP process will allow this matter to be considered at the regional scale, which is considered a much more appropriate scale. It is therefore concluded that the RLDP process should update the GTAA evidence base and reflect the outcome in its allocation and policy development.

Employment Land Delivery

- 4.18 The strategy for the LDP sets out an ambitious target for employment growth in terms of land supply and job creation. The number of jobs created over the plan period is above the forecasted trends and economic activity rates are above the Wales average and although the level of predicted development on allocated employment sites is lower than anticipated, it is considered the case that there is a development lag in delivery rather than specific concerns with the land allocations. There has been some loss of employment land to other uses, but this none of which has been approved on allocation employment land. There is still a 13-year land supply for employment uses available in Newport. Nonetheless, the growth rate required for housing supply for the next plan period and the impact from the global pandemic and the way in which it influences how we work in the future, will require a review of the level of job creation and employment land supply to ensure the strategy is robust and well considered.

Retail and City Centre footfall

- 4.19 City Centre footfall has unfortunately been falling for several years and the impact from the pandemic will have only exacerbated this. This is not unique to Newport, but it is worth noting the recent investment which indicates the markets confidence in Newport. Since the adoption of the LDP, the centre has seen the completion of the Friars Walk development which has provided a retail and leisure focus to the city centre. It was appreciated in the LDP examination that once this redevelopment had taken place there would be a need to consider its impact and this will be a key consideration for the Council within its review. Work has been undertaken by the Council to provide an up to date evidence base on this matter for development management purposes through the commission of the Nexus Retail and Leisure Study (2019). In addition, the Council has published its City Centre Masterplan and the economic growth strategy and addendum, as detailed in section 3.36 of this report. Clearly a replacement LDP will have to consider these challenges facing the city centre and reflect on the functionality of the space over the next fifteen years.

Flood Risk

- 4.20 Newport's location alongside the Severn Estuary, the River Usk dividing the City, the complex reed network of the Gwent Levels and the various other pluvial and fluvial water sources within its boundary means that flood risk management and resilience is a key consideration for the LDP. The forthcoming update to national planning policy, through Technical Advice Note 15 and the production of new All Wales Flood Mapping, will require the LDP to take into account this updated policy and evidence base context. A Strategic Flood Consequence Assessment for the RLDP will be required to ensure that any new allocations are justified in terms of any impact on flood risk.

Out commuting

- 4.21 The level of out commuting from Newport to other areas is noted but is not considered a significant concern. The strategic location of Newport and its proximity to Cardiff and Bristol means that out-commuting is always going to be a factor, but the plan will need to consider

how to reduce this in the interests of creating a sustainable city. There are many factors that are to be considered within the plans strategy to ensure that this is achieved, including provision for appropriate levels of employment land so we can ensure we are providing jobs as well as housing.

Access to facilities

4.22 Since the adoption of the LDP the Welsh Government have published an updated Index of Multiple Deprivation for Wales (2019). This will be used as a part of the evidence base for a replacement LDP, particularly using the ‘access to services’ section as a tool to understand where the plan could focus on resolving any known concerns in terms of access to facilities.

Policy Revisions

4.23 Section 5.3 of this report sets out an assessment of the current policy framework of the LDP. It is worth noting that there are a number of policies in the LDP that have been highlighted in the previous AMRs which require specific investigation so that their effectiveness is strengthened in a future LDP. These areas are:

- Community Facilities
- Mineral Safeguarding Area
- Alternative Use of Employment Land
- Loss of Environmental Space
- Site of Historical value
- Development Densities

5 POTENTIAL CHANGES REQUIRED

5.1 Review of LDP Vision, Issues and Objectives

LDP Vision

- 5.1.1 The Vision was developed to provide the core of the LDP, driving forward the intended changes for Newport from 2011. The development of the Vision was derived from the Newport Community Strategy (2005-2015), where those elements relating to and affected by land use were included.

LDP VISION (2011-2026)

As a gateway to Wales, Newport will be a centre of regeneration that celebrates its culture and heritage, while being a focus for varied economic growth that will strengthen its contribution to the region. It will be a place that people recognise as a lively, dynamic, growing City, with communities living in harmony in a unique natural environment.

- 5.1.2 Since the adoption of the LDP, the Community Strategy was replaced by a Single Integrated Plan which has been replaced by the Local Well-Being Plan; a requirement of the Well-Being of Future Generations Act (2015). The objectives of the plan are set out in section 4 and work will be underway in 2021 on an updated Well-Being Plan for publication in 2023. This review process provides an opportunity to consider the implications of the current context, since adoption of the LDP, and ensure the Vision is appropriately worded.

LDP Objectives

- 5.1.3 The LDP Vision is delivered through ten Plan Objectives which seek to ensure the delivery of a sustainable development strategy. The ten objectives were developed specifically for the LDP from the Council's Five Corporate Objectives (Caring, Fairer, Learning and Working, Greener and Healthier and Safer City). They were subsequently refined through public consultation.
- 5.1.4 A review of LDP objectives against the Seven Well Being Goals for Wales⁵ is set out below. The table illustrates which of the seven well-being goals are being delivered by each objective.

⁵ For details of the Well-Being Goals please visit: <https://www.futuregenerations.wales/about-us/future-generations-act/#:~:text=The%20Well-being%20of%20Future%20Generations%20Act%20requires%20public,such%20as%20poverty%2C%20health%20inequalities%20and%20climate%20change.>

LDP Objectives	Well – Being Goals						
	Prosperous Wales	Resilient Wales	Healthier Wales	More Equal Wales	Wales of Cohesive Communities	Wales of vibrant culture and thriving Welsh Language	Globally responsible Wales
<p>1. Sustainable Use of Land To ensure that all development makes the most efficient use of natural resources by seeking to locate development in the most sustainable locations, minimise the impact on the environment and make a positive contribution to local communities.</p>							
<p>2. Climate Change To ensure that development and land uses in Newport make a positive contribution to minimising, adapting to or mitigating against the causes and impacts of climate change, by incorporating the principles of sustainable design, changes to travel behaviour, managing the risks and consequences of flooding, and improving efficiency in the use of energy, waste and water.</p>							
<p>3. Economic Growth To enable a diverse economy that meets the needs of the people of Newport and those of the wider South East Wales economic region</p>							
<p>4. Housing Provision To ensure that there is an adequate supply of land for housing in the most sustainable locations, and to ensure that the quantity, quality and variety of housing provision meet the needs of the population. Also to foster the creation of places which contribute to local distinctiveness and thriving communities.</p>							
<p>5. Conservation of the Built Environment To ensure that all development or use of land does not adversely affect, and seeks to preserve or enhance, the quality of the historic and built environment.</p>							
<p>6. Conservation of the Natural Environment To protect and enhance the quality of the natural environment, including landscape, protected habitats and species of principal importance for biodiversity in Wales (regardless of greenfield or brownfield status) and the protection of controlled waters.</p>							
<p>7. Community Facilities and Infrastructure To ensure the provision of appropriate new, and/or enhanced existing, community facilities, and to safeguard existing well-used facilities.</p>							
<p>8. Culture and Accessibility</p>							

To ensure that development proposals and uses are socially and physically accessible to all, taking account of the needs of all individuals.	Yellow	White	Red	Dark Red	Dark Grey	Blue	White
9. Health and Well-Being To provide an environment that is safe and encourages healthy lifestyle choices and promotes well-being.	Yellow	Orange	Red	Dark Red	Dark Grey	Blue	Light Blue
10. Waste To ensure that waste management choices are based on the proximity principle, where appropriate, and a hierarchy of reduce, reuse, recovery and safe disposal, and that there is adequate provision for facilities to enable this to happen.	Yellow	Orange	Red	White	White	White	Light Blue

5.1.5 The current LDP objectives clearly contribute to achieving all seven well-being goals. Some objectives deliver across all seven goals and have clear multi-benefit outcomes. Any changes to the LDP and its objectives will be informed by and be devised in accordance with the Well-Being Goals.

5.2 **Review of LDP Strategy**

5.2.1 The key elements of the current spatial strategy are to:

- to maximise the use of brownfield sites in the interests of sustainability, regeneration, community cohesion, and urban form;
- to develop the Eastern Expansion Area of the City, focused on the former Llanwern Steelworks;
- to regenerate the retail core of the City Centre;
- to protect the landscape, including maintaining the statutory Green Belt on the Cardiff boundary;
- to conserve protected sites and species, and encourage biodiversity;
- to foster growth of the City in line with its role in the region, its locational advantages and its distinct sense of place;
- to build upon the success of Newport’s national and international class sporting facilities

In terms of measuring how successful implementing the strategy has been, each point is discussed below.

Maximise the use of brownfield sites in the interests of sustainability, regeneration, community cohesion, and urban form;

5.2.2 The overall preference of the current LDP strategy was for the development of land within the urban boundary particularly focussing on previously development sites. Regeneration was therefore a key element of the strategy where there are vacant or declining sites in need of improvement for economic, social, and environmental benefit. This regeneration focus was directed to industrial sites including the former Llanwern steelworks, former whitehead works, former Novelis factory, but it also sought the improvement of existing housing estates including Ringland and Alway as well as ensuring the City Centre is able to meet its full potential, building on the success of Friars Walk redevelopment.

- 5.2.3 This focus on regeneration within the urban boundary focussing on previously developed sites has been extremely successful. Over the plan period 94% of all houses delivered have been on previously developed sites and all development on greenfield sites has been within the policy allowance of the plan. The success of the allocated housing sites in the last plan means that new sites will need to be found to continue to ensure a sufficient housing land supply is maintained. In terms of spatial distribution, it is likely that while brownfield sites will continue to play an important role in delivering windfall sites, going forward, it is recognised that there is a limited supply of brownfield land and there is likely to be a role that greenfield sites can play in bringing forward high levels of affordable and family housing and wider provision of strategic infrastructure the LDP.

Develop the Eastern Expansion Area of the City, focused on the former Llanwern Steelworks;

- 5.2.4 The Eastern Expansion Area is focussed on the two large housing led developments at the former Llanwern Steelworks (Glan Llyn) and Llanwern Village. The former being a brownfield development and the latter greenfield. Both sites have not met the agreed rate of delivery set out in the LDP trajectory but both sites are progressing and it is clear to see the creation of new communities with the implementation of the primary school, play spaces and public house. The strategic focus on the development of this area took precedent in the previous LDP. It will remain a key part in the delivery of a future plan.

Regenerate the retail core of the City Centre;

- 5.2.5 The Plan period has seen the successful delivery of the Friars Walk redevelopment, which has made a positive impact on the retail and leisure core of the City. The previous LDP was written before the implementation of the scheme so the retail policies reflect the situation pre-Friars Walk. Since then, the Council has commissioned a Retail & Leisure Study (Nexus 2019) which recommended a flexible approach in the City Centre to attract investment. The level of vacancies, reduction in footfall numbers and pressure for out of town retail remains a concern but the vitality of district and local centres is encouraging. The impact from Covid 19 is clearly a factor in the function and level of investment of a centre such as Newport's and a replacement plan will need to consider the most appropriate policy framework for the benefit of the City.

Protect the landscape, including maintaining the statutory Green Belt on the Cardiff boundary;

- 5.2.6 Newport has a unique landscape which provides a positive and attractive hinterland to its urban centre. The AMRs have shown that over the last five years the LDP has managed to ensure that developments do not lead to the loss of important landscape or open space without conforming with plan policies. The exceptions are made when harm from e.g. renewable energy schemes are outweighed by the benefits of the proposed use. The Green Belt and Green Wedge policies have protected those areas from inappropriate developments, and they are likely to remain an important part of protecting the openness and coalescence of urban form.

Conserve protected sites and species, and encourage biodiversity;

- 5.2.7 Newport has a plethora of internationally, nationally and locally designated biodiversity features. Monitoring of the LDP has been successful in the protection of this resource and the potential impact from future development will be a key factor in a replacement Plan. There has been a contextual shift since adoption and the need for an ecosystems approach in decision making. There has also been the introduction for the requirement for Green Infrastructure Assessments set out in PPW and there are clear considerations from the enactment of the Environment Act Wales in 2016 for the next LDP.

Foster growth of the City in line with its role in the region, its locational advantages and its distinct sense of place;

- 5.2.8 Newport plays an important role in the region due to its advantageous location, good connections, and its valuable cultural and environmental environs. This has been reflected in the National Development Framework and the RLDP will look to utilise this locational advantage and distinct sense of place.

Build upon the success of Newport’s national and international class sporting facilities

- 5.2.9 The importance of sports and events to Newport continues to increase with the draw of the Newport International Sports Village, National Velodrome, improved Rodney parade facilities, International Convention Centre, and the Ryder Cup venue at the Celtic Manor. Events continue with the establishment of the ABP Newport Wales Marathon in 2018 and the more recent Westfield Health British Transplant Games hosted by the City in July 2019. The infrastructure is well established and the ability of Newport to host major events is evident. There are economic and social impacts from such activities which will need to be considered by a RLDP in terms of facility provision, accommodation needs and job creation.

Delivery of LDP Strategy

- 5.2.10 The LDP set delivery targets for the delivery of:

- 10,350 homes of which 2,061 were to be affordable; and
- 21.5 hectares of employment land, and the creation of 7,400 jobs;

The LDP has been successful in the delivery of its strategy by providing:

- 5,978 homes (only 575 units below plan requirement), of which 1,223 are affordable (only 78 units below the plan requirement);
- 26 hectares of new employment land and the level of job creation remains above the targeted rate;
- 94% housing development on brownfield land;
- The Eastern Expansion Area is progressing with both strategic sites seeing completions;
- The city centre has changed significantly since 2105 with the implementation of Friars Walk and the more recent investment in city centre regeneration e.g. Mecure Hotel;
- No Sites of Special, Scientific Interest, Sites of Special Nature Conservation, protected trees, Green Belt or Green Wedge land has been lost contrary to policy; and
- The City has hosted a number of sporting and other important events and has seen the creation of more event facilities e.g. ICC at the Celtic Manor.

For information, an overview on the delivery of LDP site allocations is set out in Appendix 1.

Conclusion for LDP Strategy

- 5.2.11 The LDP strategy has been reviewed having regard to the five AMRs, contextual changes, and internal consultation with relevant sections of the Council. Whilst the overall aims of the previous strategy remain relevant the successful delivery of the strategy means that its review is particularly relevant.
- 5.2.12 The Replacement LDP will cover the period 2021-2036. That will mean that a revised LDP will need to consider the needs of the city, including housing and employment provision, up until 2036. The successful delivery of the adopted LDP will require additional development sites to be allocated. There are also numerous required updates to the LDP evidence base including an up to date Local Housing Market Assessment, Population Projections, Economic Strategy and Land Review, Gypsy and Traveller Accommodation Assessment. The focus on the City Centre regeneration, sporting and events potential as well as protecting our unique environment is likely to continue in line with other Council priorities and the underpinning requirements of delivering sustainable development. There will be a need to consider issues that have come to the fore since the LDP adoption in 2015, including increased concerns on climate change and air quality. All these matters will need to be considered as part of a RLDP.

5.3 Review of LDP Policies

- 5.3.1 The LDP policies have been reviewed having regard to the following:
- The findings of the past five Annual Monitoring Reports (AMR's);
 - Significant contextual changes that have occurred since the adoption of the Plan, including changes in national, regional, and local policies, legislation and strategies;
 - Internal consultation has occurred with various departments, including planning committee, within the Council. Virtual focus groups, questionnaires and presentations were used to gather information on the limitations, omissions, and successes of the current policy framework.
- 5.3.2 A summary of the policy review assessment is set out in Appendix 2. This gives an overview of whether a policy/allocation is functioning effectively, whether any amendments are likely to be needed and whether any policies should be removed or amalgamated as part of the Plan revision process. The policy assessment undertaken to date is not considered to be definitive and further consideration will be given to the need to revise the Plan's policies as part of the revision process.
- 5.3.3 The revision of the Plan will also need to consider the implications of an extended Plan period. The current Plan runs to 2026, with the Replacement Plan setting a plan period from 2021-2036. Extending the Plan period will result in a revised dwelling need and a requirement for new sites for both market and affordable dwellings. It will need to take account of the revised version of Planning Policy Wales, latest population and household projections and a revised

Local Housing Market Assessment, as well as other updates to the evidence base. Furthermore, the review process can also explore the ways that a new plan could respond to current challenges such as the climate change, projected increase in population for Newport and other issues identified below. These updates and issues will need to be thoroughly considered and addressed in a comprehensive manner.

- 5.3.4 Based on the policy review assessment, the key policy topic areas are discussed in more detail below.

Climate Change: *SP1, SP3, GP1, CE10*

- 5.3.5 The LDP looks to tackle the causes and effects of climate change through the adoption of sustainable principles and development. Reflecting on the sustainable foundation of the Plan as a core principle, future iterations will need to reflect on the most up to date considerations and ensure a suitable policy framework.
- 5.3.6 **Flood Risk:** Much of Newport is located on the floodplain, and consequently Newport deals with a significant number of applications affected by flood risk. Monitoring for the flood risk policies shows 29 applications have been permitted in flood zone which did not meet the flood risk criteria set out in TAN15 over the 5 years of AMRs. While these applications were considered permissible on the basis of regeneration, or that there was an acceptable level of risk or that there was no discernible increased risk from the development, there is clearly a dichotomy which will need to be investigated further.
- 5.3.7 Of relevance to the policy review is the forthcoming update to Technical Advice Note 15, the production of new All Wales Flood Mapping, an updated Strategic Flood Consequence Assessment, and the mandatory standards for Sustainable Drainage Systems.
- 5.3.8 **Renewable Energy:** The past AMRs have found that the renewable energy policies are functioning effectively in respect of the provision of renewable energy, with a total of 11 schemes incorporating on-site renewable energy, creating up to 80.35MW of energy, permitted since the LDP's adoption (excluding permitted development). However, significant contextual changes have occurred in relation to renewable and low carbon energy since LDP adoption which will need to be considered and addressed through the LDP revision process.
- 5.3.9 Welsh Government produced a revised version of "Planning for Renewable and Low Carbon Energy" in September 2015. The update includes an additional section relating to how local planning authorities assess the potential for solar farm developments. The revised toolkit provides a methodology to assist in the production of Renewable Energy Assessments (REAs) and additional advice on how to translate the results of the REAs into the LDP evidence base, resulting policies and setting targets. Local authorities are expected to undertake a proactive approach to all forms of renewable and low carbon energy generation. The revised LDP will need to consider the revised Toolkit and address the additional requirements set out within it.

Health: SP2, GP7

- 5.3.10 It is considered that current policies regarding health are functioning effectively. However, as part of the review of the plan a review of these policies will take place to ensure that they cover all aspects of the health agenda that planning has the ability to make a difference. Overall, the plan review process will need to look beyond AMR reporting and the analysis of existing policy in response to the increased evidence, which highlights the links between health and the built environment and seeks to favour the creation of healthier and active environments. In particular, the review process can consider things like the need for dementia friendly environments and explore the links between obesity, health and well-being, air quality and healthy and active lifestyles and the built environment and consider the most appropriate policy response to this changed context. This will be informed by the Health Impact Assessment set out in the Integrated Sustainability Appraisal work for the RLDP.

Green Infrastructure: SP5, SP6, SP7, SP8, SP9, CE1, CE2, CE3, CE9

- 5.3.11 The existing open space and accessible natural green space policies contained in the LDP were informed by various technical background papers. These assessed the quantity of outdoor recreation, public open space provision, allotment provision, Green Wedge, Settlement boundary, SINC's etc. across the authority. The new requirement set out in PPW for a Green Infrastructure Assessment will combine the update of these technical papers and other requirements of GIA work to inform plan allocations and policy wording. The effectiveness of the green infrastructure related policies has been monitored by the 5 AMR's produced to date and have shown that that this has been effective.
- 5.3.12 Given this, it is considered that these policies are functioning effectively there are opportunities to build upon the importance of connectivity by exploring and consolidating upon linkages with other policy areas, particularly those that promote green infrastructure. An appropriate review of evidence and the role of the Placemaking and Design will be undertaken as part of developing an understanding of the benefits and value of such an approach along with a review of the evidence base, to ensure it takes account of changes in national planning policy and contextual changes.

Heritage: SP9, CE4, CE5, CE6, CE7

- 5.3.13 The Heritage policies are generally considered to be functioning effectively. All previous AMR's have shown that the vast majority of relevant applications received on historic environment assets were considered to be policy compliant subject to conditions/recommendations placed on the permission. A few applications were permitted with an outstanding objection from statutory heritage advisors and research will be undertaken to understand what alterations may be necessary to aid any concerns raised. Signposting to recent contextual changes e.g. Cadw guidance is likely to be helpful.

Ecology: SP4, SP9, GP5, CE8

- 5.3.14 The LDP was informed by Habitats Regulations Assessment (HRA), the purpose of which is to assess the impacts of a land use plan, in combination with the effects of other plans and projects, against the conservation objectives of internationally important European sites of nature conservation importance, such as Special Areas of Conservation and Special Protection Areas (designated for their ecological status) and to ascertain (following screening) what

needs Appropriate Assessment (AA). This process shall be undertaken as part of the RLDP and any amendments to the policy framework shall be considered.

- 5.3.15 The ecological policies seek to ensure the protection and enhancement of the natural environment, and in doing so, contribute towards moderating the potential adverse effects of other policies that infer physical development even on previously developed land. The policies are generally considered to be functioning effectively but the evidence base will need to be updated to ensure that the relevant designations, species, and habitats are considered. The recent requirement for ecological mitigation will also need to be considered to ensure clarity of process.

Housing: SP10, SP11, H1- H17

- 5.3.16 Following the revision to PPW and the revocation of TAN 1 in its entirety, the revised LDP Manual (Edition 3) sets out how annual housing completions must be monitored against the Anticipated Annual Build Rate (AABR). The RLDP will need to include a housing trajectory taking into account the phasing of sites to ensure that it meets the requirement of the LDP manual.
- 5.3.17 The housing requirement set out in the current LDP is 10,350 dwellings (Policy SP10) over the Plan period 2011-2026. This figure was primarily informed by the 2008 WG household projections which projected a population rise of 10% over the Plan period. The latest official WG population and household projections (2018) continue to project an increase in population for Newport. The WG projections will be used as the basis for informing the future housing requirement figures for the RLDP. The next plan process will need to assess the most appropriate level of growth for a Plan period beyond the end date of the existing LDP.
- 5.3.18 The housing delivery rates achieved since the adoption of the LDP have been impressive delivering 5,978 units to date, that is only 575 units below the LDP target. (April 2020). Newport has been one of the few authorities in Wales to achieve a consistent 5-year land supply of housing and while the 2020 AMR noted a slight under delivery (4%) against agreed rates for housing sites, set out against the Average Annual Requirement (AAR) it was considered that delivery remain acceptable.
- 5.3.19 The need for integration of employment and housing place a pressure on the take up of brownfield land from other uses. The success of the allocated housing sites in the last plan means that with the current completion levels and clear progression of many other allocated sites, the LDP allocations for housing are meeting demand. This does mean that new sites will need to be found to continue this successful achievement to ensure a sufficient housing land supply is maintained. In terms of spatial distribution, it is likely that while brownfield sites will continue to play an important role in delivering windfall sites, going forward, it is recognised that there is a limited supply of brownfield land and there is likely to be a role that greenfield sites can play in bringing forward high levels of affordable and family housing and wider provision of strategic infrastructure the LDP.

Employment: *SP17, SP18, EM1, EM2, EM3*

- 5.3.20 The Local Development Plan's employment land is safeguarded for employment purposes by Policies SP17 and EM1. The future prosperity of the local economy is facilitated by ensuring that the authority can offer a range and choice of employment sites and premises for employment uses. As part of the revision process, consideration will be given to the employment strategy to take account of the industrial and business allocations that have been developed since LDP adoption. Consideration will also need to be given to the 'economies of the future' and their locational, sites and premises requirements.
- 5.3.21 The AMRs indicate significant progress has been made in reference to the delivery of employment land allocated under Policies SP17 and EM1. However, it is noted 16 planning applications over the course of the 5 AMR's that involved the loss of employment land did not fully consider policy EM3. This was indicated as "training required". While the majority of applications did consider this policy, any future LDP revision should consider if the policy wording and criteria are, appropriately and workable for the future.

Planning Obligations: *SP13, H4*

- 5.3.22 The planning obligations policies are generally considered to be functioning effectively. Amendments may be required in particular with regard to the strategic and site specific viability work and subsequent thresholds set to reflect the updated assessments.

Community Facilities: *SP12, CF1-CF13*

- 5.3.23 The community facility policies are generally considered to be functioning effectively, however, consideration should be given to whether there is a need to narrow the define definitions within the policies such as community facilities (CF12) and Tourism (CF8) and what opportunity there are to combine underused policies.

Transport: *SP14, SP15, SP16, GP4, T1 -T8*

- 5.3.24 The review of the Plan's transport policies indicates that there are currently no concerns with their effectiveness and implementation, as detailed in Appendix 2. However, a number of contextual changes have occurred since the Plan's adoption, which will need to be taken into account in the LDP revision process including subsequent outcomes of the South East Wales Transport Commission and Metro.
- 5.3.25 The Council has undertaken a series of existing and integrated Active Travel Route Maps; this will provide a new evidence base for the RLDP on sustainable travel matters. There is a clear role set out for the planning system to facilitate active travel, and the RLDP will need to consider the outputs and how the cultural shift towards prioritising active travel is undertaken e.g. through developments, planning policy, planning obligations etc.

Retail and the City Centre: *SP19, R1 - R11*

- 5.3.26 The existing LDP was informed by the Colliers Retail Study and Capacity Assessment, (2012), which evidenced the need to focus new retail and commercial developments in the identified retail hierarchy to assist in sustaining and enhancing the City Centre, District and Local centres and building sustainable communities. Since the adoption of the LDP the city centre has seen

the completion of the Friars Walk development which has provided a greater retail and leisure focus to the city centre and this will be a key consideration for the Council within its review. In addition, the monitoring of the retail policies set out in the 5 AMRs has continually raised concern in particular with the primary and secondary shopping frontages, the level of vacancies, reduction in footfall numbers and pressure for out of town retail.

5.3.27 Work has already been undertaken by the Council to provide an up to date evidence base on this matter for development management purposes through the commission of the Nexus Retail and Leisure Study (2019). In addition, the Council has published its City Centre Masterplan and the economic growth strategy and addendum. The updated retail and leisure study will help inform the Plan revision in terms of retail strategy, retail policies and LDP allocations. Further work will also be undertaken in response to the current challenges faced by the High Street to inform the merits or otherwise of how future LDP policy can respond most effectively.

Waste: SP20, W1, W2, W3

5.3.28 The Waste policies are generally considered to be functioning effectively and the SPG has been considered useful. The need to provide enough land for waste facilities, as required by PPW, will be considered as well as the need for any Council required facilities.

Minerals: SP21, M1, M2, M3, M4

5.3.29 The Minerals policies were prepared in the context of the Regional Technical Statement (RTS) of the South Wales Regional Aggregates Working Party (SWRAWP) (October 2008). A second ongoing Review of the RTS is currently being finalised and endorsement sought from each MPA. The review of the LDP will need to consider the implications of the recommendations in the second Review of the RTS along with any changes in current Government guidance. The monitoring of the Minerals policies set out in the AMRs show that the policies SP21, M1 and M2 have been constantly shown as “training required” any future LDP revision should consider if the policy wording is appropriately and workable.

Supplementary Planning Guidance

5.3.30 A number of supplementary planning guidance (SPG) documents to support key LDP policy areas have been approved by the Council since adoption of the plan. These are:

- Planning Obligations SPG
- Affordable Housing SPG
- Archaeology and Archaeologically Sensitive Areas SPG
- Wildlife and Development SPG
- House Extensions and Domestic Outbuildings SPG
- New Dwellings SPG
- Flat Conversions SPG
- Mineral Safeguarding SPG
- Outdoor Play Space Provision SPG
- Trees, Woodland, Hedgerows and Development Sites SPG
- Air Quality SPG
- Security Measures for Shopfronts and Commercial Premises SPG
- Caerleon Conservation Area Appraisal SPG

- Waste Storage and Collection SPG
- Parking Standards SPG
- Housing in Multiple Occupation SPG
- Sustainable Travel SPG
- Stow Park Conservation Area Appraisal SPG
- Clytha Conservation Area Appraisal SPG
- The Shrubbery Conservation Area Appraisal SPG

5.3.31 A review of the existing SPG, including ones recently adopted, will be undertaken as part of the LDP Revision process where time allows. The need for additional SPG will also be a matter for the revised LDP process.

Proposals Plan and Constraints Plan

5.3.32 The form and content of the LDP Proposals Plan will require changes as part of the LDP Review to reflect any changes to the plan.

5.3.33 The LDP Constraints Plan contains designations that are not directly proposals of the LDP but are constraints to development created by legislation or other mechanisms outside of the LDP process such as Flood Risk Areas and SSSI's, etc. The printed Constraints Plan for the LDP represents a point in time and includes several designations particularly flood risk areas that have been updated since adoption of the LDP and therefore it is out of date. In addition to a printed plan the Constraints Plan, alongside the Proposals Plan, will be produced in an electronic form with public access that will allow for it be updated, as necessary.

6 FUTURE EVIDENCE BASE REQUIREMENTS

6.1 **The contextual and evidence base changes** that have occurred since the Plan’s adoption in 2015, including updates to WG population and household projections, indicate that the RLDP will need to be revised to reflect such changes. Other elements of the LDP evidence base will also need to be updated as part of the plan preparation process, as detailed below. To inform the review of the LDP there will be a need to update various elements of the evidence base that informed the current Local Development Plan in order to fully understand the land use requirements of the City up to 2036. A sample of potential evidence base studies which may be required to inform the LDP include:

- Population and household forecasts
- Local Housing Needs Assessment
- Employment Land Review
- Affordable Housing Viability Assessment
- Gypsy and Traveller Accommodation Needs Assessment
- Strategic Flood Consequence Assessment
- Retail and Leisure Study
- Green Infrastructure Assessment
- Renewable Energy Assessment
- Landscape Assessment

6.2 This is not a definitive list and additional evidence base requirements may emerge as the plan revision progresses. Opportunities to undertake this work with other LPAs is discussed in Section 7.

SUSTAINABILITY APPRAISAL INCLUDING STRATEGIC ENVIRONMENTAL ASSESSMENT

6.3 A requirement of the LDP process is that Sustainability Appraisal (SA) incorporating Strategic Environmental Assessment (SEA) informs preparation of the LDP. The SA/SEA process is integral to the development of the LDP to ensure the policies in the LDP promote Sustainable Development through integration of the key economic, environmental, social and cultural objectives in the development of the LDP policies and proposals and take account of any significant effects on the environment. The SA/SEA has been an iterative process throughout preparation of the LDP and policies and proposals in the LDP reflect this.

6.4 SA monitoring of the Sustainability Appraisal Objectives is undertaken on an annual basis and reported through the LDP Annual Monitoring Report. This enables the Council to assess the extent to which the LDP is contributing to the achievement of sustainable development and to identify any concerns. To inform the review of the LDP, it will be necessary to revisit and update the environmental, social and economic baseline information, along with the review of relevant plans policies and programme. The SA Monitoring Framework including the SA Objectives will need to be reviewed to ensure this remains up to date, and this will include considering whether the methodologies need revising due to changes in legislation.

- 6.5 An Integrated Sustainability Appraisal⁶, (SA) incorporating Strategic Environmental Assessment⁷ (SEA) and Welsh Language Impact Assessment (LIA), is a statutory requirement of LDP preparation. The Council will undertake an Integrated Sustainability Appraisal (ISA) but shall broaden the scope of this integrated assessment to ensure that it also captures a few other impact assessments. This approach will assess the contribution the RLDP can make to the Well-Being Goals and ensures a collaborative approach on a variety of issues, recognising links between them and avoiding duplication of work. This holistic and integrated approach will ensure that as well as the SA, SEA and LIA (noted above) the integrated assessment will include as a minimum an Equalities Impact Assessment (EIA), Health Impact Assessment (HIA) and a clear understanding of how the Welsh well-being goals are influencing the plan. For future reference, the Integrated Sustainability Appraisal should be considered to include the broader assessments as noted above. The ISA process will run concurrently with the plan making process and forms an iterative part of plan preparation.

HABITAT REGULATIONS ASSESSMENT

- 6.6 The LDP was informed by Habitats Regulations Assessment (HRA), the purpose of which is to assess the impacts of a land use plan, in combination with the effects of other plans and projects, against the conservation objectives of internationally important European sites of nature conservation importance such as Special Areas of Conservation, Special Protection Areas (designated for their ecological status) and RAMSAR and to ascertain following screening what needs Appropriate Assessment (AA). As part of the review of the LDP, the HRA will need to be reviewed.

⁶ Section 62 (6) Planning and Compulsory Purchase Act 2004

⁷ European Union Directive 2001/42/EC & Environmental Assessment of Plans and Programmes (Wales) Regulations 2004

7 OPTIONS FOR REVIEW

- 7.1 A key outcome of the final Review Report is to make a recommendation on the type of revision process to be followed, based on the evidence contained in the report. This can either be a short form or full revision. This Draft Review Report forms a discussion document to seek the views of stakeholders on the best way to proceed. A conclusion on the form of review is set out in section 8.

JOINT LDPs AND JOINT WORKING

- 7.2 In line with the development plan manual, consideration must be given to the scope for preparing a Joint LDP with another LPA. It is noted that out of the 10 authorities in South East Wales, there are no examples of a joint LDP being undertaken. There are however many examples of joint working within the region. Of the 10 authorities only Cardiff and Caerphilly, as neighbouring authorities, have a similar timescale for the preparation of a replacement plan. On reflection, it is considered that the preparation of a joint plan is not appropriate due to the lack of synergy on key aspects of plan preparation. Each authority has unique factors to consider within their own plan that would not benefit from a strict joint approach, e.g. Newport's identification in the 'Future Wales: The National Plan 2040' (NDF) as a national area of growth.
- 7.3 Nonetheless, there are clear opportunities for joint working within the region. Where opportunities have arisen, Newport has taken the opportunity to commission work with neighbouring authorities e.g. Renewable Energy and Employment studies. This will continue throughout the plan development whenever possible. There is an existing collaborative relationship across the South East Wales region which will be utilised to ensure that we maximise efficiencies and consistency where appropriate and cross-boundary matters are adequately addressed.
- 7.4 It is therefore considered that the most appropriate way forward is to respond to local issues and maintain plan coverage and wherever possible produce and share a joint evidence base.

8 CONCLUSIONS AND NEXT STEPS

Recommendation

- 8.1 In terms of the procedural route for revision of the Newport LDP, it should be noted that the plan is already subject to the statutory 4-year full review, and as such, all aspects of the plan will need to be assessed to consider if they remain sound and fit for purpose. It is considered, irrespective of the deadline for review set by legislation, that based on this report, the most appropriate form of review is the **Full Revision Procedure** and a Replacement LDP is prepared for the period 2021-2036.

9. GLOSSARY

AAR	Annual
AMR	Annual Monitoring Report
AVHA	Affordable Housing Viability Assessment
CCR	Cardiff Capital Region
CIS	Community Involvement Scheme
DA	Delivery Agreement
PCPA	Planning and Compulsory Purchase Act
GTAA	Gypsy and Traveller Accommodation Assessment
HRA	Habitat Regulations Assessment
JHLAS	Joint Housing Land Availability Study
LDP	Local Development Plan
RLDP	Replacement Local Development Plan
MYE	Mid-Year Population Estimates (supplied by Office of National Statistics)
MPA	Mineral Planning Authority
NDF	National Development Framework
ONS	Office of National Statistics
PPW	Planning Policy Wales
PSB	Public Service Board
SA	Sustainability Appraisal
SAC	Special Area for Conservation
SEA	Strategic Environmental Assessment
SEWSPG	South East Wales Strategic Planning Group
SINC	Site of Importance for Nature Conservation
TAN	Technical Advice Note

APPENDIX 1: LDP Allocation Review

A1.1 The following tables summarises the progress made with regards to the delivery of allocations listed within the LDP. This includes Housing, Gypsy and Traveller Accommodation, Employment Land and Education Allocations.

PROGRESS MADE ON LDP HOUSING ALLOCATIONS

LDP Reference	Units to deliver within LDP	Units complete	% complete	Progress Update
H1(1) McReadys, Ponthir Rd	54	56	100%	Site complete.
H1(3) Llanwern Village	1100	31	3%	Developer on site progressing
H1(4) Pirelli	250	221	100%	Site complete.
H1(5) Glebelands	153 (Now 215)	58	27%	Developer on site progressing
H1(7) Bethesda Close	22	22	100%	Site complete.
H1(8) The Severn Stiles	23	0	0%	Developer interest in the site.
H1(9) Frobisher Road	16	16	100%	Site complete.
H1(10) Pencoed Castle	12	0	0%	Access road has been implemented.
H1(11) Laburnum Drive	20	20	100%	Site complete.
H1(12) Former Tredegar Park Golf Course	150	119	79%	Developer on site progressing
H1(13) Allt-Yr-Yn Campus	125	125	100%	Site complete.
H1(14) Monmouthshire Bank Sidings	517	517	100%	Site complete.
H1(15) Victoria Wharf, Old Town Dock	130	0	0%	Planning permission (16/0789) granted 21/09/2017 for 93 units with a 3 year time period for implementation.
H1(16) Penmaen Wharf	160	0	0%	Planning permission has lapsed. The site is within Flood Risk Zone C2.

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H1(17) Former Hurrans Garden Centre	60	60	100%	Site complete.
H1(19) Land at Hartridge High School	65	0	0%	The site is linked to the development of the Jigsaw site.
H1(21) Former Floors 2 Go	10	0	0%	No planning permission in place. No completions expected within the next 5 years.
H1(23) Traston Lane	21	0	0%	Planning permission for a revised scheme was granted in late 2012. Limited progress made.
H1 (24) 30-33 High Street	16	16	100%	Site complete.
H1(25) Taylors Garage	71	71	100%	Site complete.
H1(26) Ty Du Works	26	26	100%	Site complete.
H1(30) Rear of South Wales Argus	89	89	100%	Site complete.
H1(31) Roman Lodge Hotel	10	0	0%	Owner is concentrating on the hotel use. Residential development not anticipated within the next 5 years.
H1(32) Former Sainsbury's	140	0	0%	Mixed use proposal for 140 residential units; student accommodation; hotel and commercial. Outline planning permission approved 20/04/2016. The outline permission is very detailed with not many outstanding issues to be approved via reserved matters. Demolition and construction of a flood defence bund in conjunction with NRW is now complete, however very little progress has been made since.
H1(34) Bankside Coverack Road	38 Now 76	0	0%	Revised scheme for 76 apartments approved subject to the signed of a S106 – ref: 18/1169.
H1(36) Farmwood Close	10	0	0%	Extant planning permission which has been implemented by the commencement of 10 units. No known intent for the site.
H1(37) City Vizion	338	338	100%	Site complete.
H1(38) Lysaghts Village (Orb Works)	559	559	100%	Site complete.

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H1(39) Former Bettws Comprehensive	224	224	100%	Site complete.
H1(40) Westmark, Old Town Dock	154	64	41%	Footings are in place for the remaining 90 units. There is no information as when the last block of flats will be completed.
H1(41) Trinity View	16	15	94%	Long standing self-build development. Properties tend to be delivered at a rate of 1 house per annum.
H1(42) Black Clawson (Alexandra Gate)	63	63	100%	Site complete.
H1(43) Portskewett Street (Liberty Grove)	92	0	0%	Planning application 17/0038 for 92 flats granted 20/03/2018.
H1(44) Turner Street	32	32	100%	Site complete.
H1(45) Lysaghts Parc	100	0	0%	Remaining 100 units of a wider residential scheme. Linc Cymru are in the process of selling the land for development.
H1(47) Glan Llyn	4000	780	20%	Developer on site progressing with two developers on site.
H1(51) Whitehead Works	498	0	0%	Whitehead Development Company Ltd (subsidiary of Tai Tirion) set up to promote the site. Welsh Government has agreed a £7m commercial loan to WDC. Remediation works are complete on site. Resolution to approve the outline planning application has been agreed subject to the signing of a S106. (15/0775). 18/1039 – Phase 1 Reserved matters application approved 17/3/20. 471 Units (226 Tirion, 245 Lovell).
H1(52) Old Town Dock Remainder – East Dock Road	288	45	16%	Site has progressed with 89 completions and a developer interest on remainder of the site
H1(53) Bideford Road	35	0	0%	Completions not anticipated within the next 5 years.
H1(54) Jubilee Park Former Alcan Site	934	830	89%	Developer on site progressing
H1(55) Jigsaw Site, Ringland	200	0	0%	Site to be promoted for development alongside Hartridge High School site.
H1(56) Opposite Belmont Lodge	122	0	0%	Permission is extant and owner has concentrated on the implementation of the

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				ICC. Housing development not anticipated over the next year.
H1(57) Treberth Crescent	58	0	0%	Pobl scheme – 18/1231 for 45 older person homes approved. Expected to start on site in 2020.
H1(58) Panasonic	250	250	100%	Site complete.
H1 (59) 24 Crawford Road	10	0	0%	18/0255 - Partial discharge of condition relating to app 11/1258 for 21 flats.
H1 (60) Parry Drive	15	15	100%	Site complete.
H1 (61) Former Postal Exchange, Mill Street	70	0	0%	Residential no longer being pursued on the site – converted to new office building.
H1 (62) Former Queens Hill School	92	0	0%	18/0507 – Hybrid application – outline for 96 units and full for some demolition works – approved 05/02/2019 20/0236 – Condition discharge - awaiting decision
H1 (63) Telford Depot	60	0	0%	NCC owned site. No progress.
H1 (64) Uskside Paint Mills	53	0	0%	Completions not anticipated during the next 5 years.

PROGRESS MADE ON DELIVERY OF GYPSY/TRAVELLER ALLOCATION

LDP Reference	Total Pitches	Pitches complete	% complete	Progress Update
H16 Hartridge Farm Road	Up to 43	3	7%	A full planning application for 35 pitches on the Hartridge Farm Road site was approved in August 2016. Delivery will be phased to ensure the supply meets the demand. Three pitches have been fully completed, with the infrastructure in place for nine.

PROGRESS MADE ON DELIVERY OF EMPLOYMENT LAND ALLOCATIONS

LDP Reference	Use	Hectares developed	% complete	Progress Update
EM1 (i) Duffryn	B1, B2 and B8	0	0	No progress has been made on this site.

EM1 (ii) East of Queensway Meadows, South of Glan Llyn	B1, B2 and B8	0	0	An application for a B8 Lorry Park and associated infrastructure (3.14ha) has been approved.
EM1 (iii) Celtic Springs	B1	0	0	An application for residential development on this land was resisted by the Council. No employment land proposals have come forward for this allocation to date.
EM1 (iv) Solutia	B1, B2, B8 and leisure	2.56	6.0%	Eastman (formally known as Solutia) is developing this site for development that directly benefits their chemicals business. A storage facility and heat and power plant has already been constructed and a Therminol Production plant was completed in 2016/17. (Therminol is a high temperature heat transfer fluid and is used in products such as solar panels).
EM1 (v) Gwent Europark	B8 distribution	0	0	An outline planning permission for B8 distribution centres is in place for this allocation, but there have been no signs of any development progress in recent times. An application was approved in 2019 to allow B1 and B2 use at the site as well.
EM1 (vi) Land off Chartist Drive	B1, B2 and B8	0	0	No progress has been made on this site.
EM1 (vii) Llanwern former steelworks, eastern end	B1, B2 and B8	7.97	22.5%	Phase 1 of the Celtic Business Park has been completed. This was the first speculative employment scheme to be completed in Newport since before the recession. The CAF train factory (6ha of employment land) opened in late 2018. Additional phases of land also have permission but no
EM1 (viii) Phoenix Park (former Pirelli works) Corporation Road	B1, B2 and ancillary use	0	0	No progress has been made on this site.
EM1 (ix) Godfrey Road (Rear of Station)	Business and Commercial uses	0	0	No progress has been made on this site.

PROGRESS MADE ON DELIVERY OF EDUCATION ALLOCATIONS

LDP Reference	School	Progress Update
CF13 i) Former Whitehead Works, Cardiff Road	Primary School	Outline planning permission for a residential scheme along with a school has been granted, subject to signing of the S106 agreement.
CF13 ii) Jubilee Park (Former Alcan/Novelis Site)	Primary School	The school opened for the first day of term in September 2017.
CF13 iii) Glan Llyn	Primary School 1	The school opened for the first day of term in September 2019
CF13 iii) Glan Llyn	Primary School 2	No plans to deliver the second primary school at Glan Llyn yet.
CF13 iv) Llanwern Village	Primary School	The residential development has now commenced. The school will be delivered at a later phase.

APPENDIX 2: LDP Policy Review

- A2.1 The following tables summarises the policy review assessment undertaken with specific Council departments and LDP users to ensure that as well as reflecting on the implementation of the policies as written any limitations or omissions are captured by those implementing the LDP.
- A2.2 For each policy it should be assumed that amendments may be required to reflect contextual changes, evidence, updated legislation, and national policies and accommodate future changes to spatial strategy.

Strategic Policies		Commentary
SP1	Sustainability	Review necessary – to reflect the placemaking agenda and ensuring the policy does not duplicate other policy areas.
SP2	Health	Review to consider Air Quality, and Dementia friendly topics as well as links between open spaces and physical and mental health.
SP3	Flood Risk	Revision necessary – 4 of the past 5 years – issues have been highlight with monitoring target (MB1,MT3). The role of NRW and NCC needs clarifying this may be done through the new TAN 15. Impact of new flood maps and outcome of SFCA will influence future policy wording.
SP4	Water Resources	Functioning effectively
SP5	Countryside	A review of both the Settlement and Village boundaries will take place to ensure it reflects the up to date position from 2015 and development allocation decisions.
SP6	Green Belt	Functioning effectively.
SP7	Green Wedges	A review of both the boundary of the Green Wedge will take place to ensure it reflects the up to date position from 2015 and development allocation decisions.
SP8	Special Landscape Areas	Functioning effectively – SPG has not been provided to date review on whether this is still necessary.
SP9	Conservation of the Natural, Historic and Built Environment	AMR highlighted as a concern where an outstanding objection remained in regard to the impact on a Listed Building. Further investigation as to the effectiveness of this policy and signposting to more up to date guidance, post Historic Environment Act.
SP10	House Building Requirement	Revision necessary – revised level of housing growth over new plan period in relation to housing requirement and spatial strategy.
SP11	Eastern Expansion Area	Revision necessary – is this allocation still necessary due to successful implementation of this policy.
SP12	Community Facilities	Amendments required to considered what is defined as community facilities and where they are best located. There is a need to consider the purpose of the policy and what is trying to be achieved.
SP13	Planning Obligations	Functioning effectively – SPGs will be updated to reflect new requirements linked to viability work for new developments.
SP14	Transport Proposals	Amendments required to considered Active Travel and transport hierarchy, outcome of WG decision on M4 relief road, RLDP growth options and development allocation decisions.
SP15	Integrated Transport	Amendments required to considered Active travel and transport hierarchy.
SP16	Major Road Schemes	Amendments required to considered transport hierarchy, outcome of WG decision on M4 relief road, RLDP growth options and development allocation decisions.

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SP17	Employment Land	Revision Necessary - to reflect RLDP growth options and to assess the long term impact of Covid and how the current shift to home working will impact on employment sites long term.
SP18	Urban Regeneration	Updates and amendments required to reflect successful delivery of regeneration schemes outlined in policy text, contextual changes, evidence, updated legislation and national policies and accommodate future changes to spatial strategy.
SP19	Assessment of Retail Need	Revision Necessary – the current plan was adopted prior to the Friars Walk redevelopment. The level of vacancies, reduction in footfall numbers and pressure for out of town retail remains a concern and a more flexible approach should be considered.
SP20	Waste Management	Functioning effectively.
SP21	Minerals	Revised to Reflect up to date Regional Technical Statement.

	General Policies	Commentary
GP1	Climate Change	Revision necessary to reflect spatial strategy over the extended period.
GP2	General Amenity	Functioning effectively.
GP3	Service Infrastructure	Functioning effectively.
GP4	Highways and Accessibility	Amendments required to considered Active Travel and transport hierarchy.
GP5	Natural Environment	Amendments to include signposting to enhancement requirements, Bee Friendly City status, outcome of HRA and ISA..
GP6	Quality of Design	Amendments required to clearer define “Good Design,” and opportunity to stress the importance of place-making.
GP7	Environmental Protection and Public Health	Revision necessary - to reflect and provide enhanced clarity on dealing with pollution matters e.g. noise, overheating and air quality matters.

	Environment Policies	Commentary
CE1	Routeways, Corridors and Gateways	Functioning effectively
CE2	Waterfront Development	Functioning effectively
CE3	Environmental Spaces and Corridors	Functioning effectively
CE4	Historic Landscapes, Parks, Gardens and Battlefields	Functioning effectively
CE5	Locally Listed Buildings and Sites	Review whether a local list is to be produced
CE6	Archaeology	Functioning effectively
CE7	Conservation Areas	Functioning effectively
CE8	Locally Designated Nature Conservation and Geological Sites	Functioning effectively
CE9	Coastal Zone	Amendments may be required to reflect impact from the National Marine Plan and monitoring requirements
CE10	Renewable Energy	Revision necessary to reflect government and local targets, with the policy text updated to be more in line with national policy.

	Housing Policies	Commentary
H1	Housing Sites	Revision necessary – revised level of housing growth over new plan period in relation to housing requirement and spatial strategy.

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H2	Housing Standards	Review whether the policy can further reflect updates in design and lifetime development needs.
H3	Housing Mix and Density	Revision necessary – to reflect on why the policy has not been met and whether the allocation of new development sites will require further clarification within this policy
H4	Affordable Housing	Revision necessary – revised level of housing growth over new plan period in relation to housing requirement and spatial strategy. A review of site viability and previous success of commuted sum requirements.
H5	Affordable Housing Exceptions	Revision necessary –required greater clarification on what is local need.
H6	Sub-division of Curtilages, Infill and Backland Development	Functioning effectively
H7	Annexes to Residential Dwellings	Functioning effectively
H8	Self Contained Accommodation and Houses in Multiple Occupation	Revision Necessary – Whilst an additional SPG has been prepared, appeal decisions are not always supporting the Council’s position so a review is considered timely.
H9	Housing Estate Regeneration	Update in line with successful delivery of Alway, Ringland and Pillgwenny Regeneration schemes. Identify specific allocations if required.
H10	Conversions in the Countryside	Functioning effectively
H11	Outbuildings and Extensions to Conversions	Functioning effectively
H12	Replacement Dwellings in the Countryside	Functioning effectively
H13	Extensions to Dwellings in the Countryside	Functioning effectively
H14	Caravans	Functioning effectively
H15	Gypsy and Traveller Transit Accommodation	Revision Necessary – to reflect updated needs assessment.
H16	Gypsy and Traveller Residential Accommodation	Revision Necessary – to reflect updated needs assessment.
H17	Gypsy and Traveller Accommodation Proposals	Functioning effectively

Employment Policies		Commentary
EM1	Employment Land Allocations	Revision Necessary - to assess the long term impact of Covid and how the current shift to home working will impact on employment sites long term. What ancillary facility are appropriate in and employment site?
EM2	Newport Docks	Functioning effectively
EM3	Alternative uses of Employment Land	Revision Necessary - to reflect RLDP growth options and to assess the long-term impact of Covid and how the current shift to home working will impact on employment sites long term. What is defined as commercial leisure developments, clarification on what constitutes “marketing”, consider restricting COU of recently constructed employment sites.

Transport Policies	Commentary
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	Transport Policies - General	Amendments required to considered Active Travel and transport hierarchy.
T1	Railways	Functioning effectively
T2	Heavy Commercial Vehicle Movements	Functioning effectively
T3	Road Hierarchy	Functioning effectively
T4	Parking	Revision required – to reflect national policy requirements, consider boundaries of parking zones and ULEV charging implications.
T5	Walking and Cycling	Functioning effectively
T6	Public Rights of Way Improvement	Functioning effectively
T7	Public Rights of Way and New Development	Functioning effectively
T8	All Wales Coast Path	Should this be combined with Policy T7?

Retailing and the City Centre Policies		Commentary
R1	City Centre Schemes	Revision Necessary to all City Centre Retail Policies – the current plan was adopted prior to the Friars Walk redevelopment. The level of vacancies, reduction in footfall numbers and pressure for out of town retail remains a concern and a more flexible approach should be considered.
R2	Primary Shopping Frontage	
R3	Non-Retail Uses in Secondary City Centre Shopping Areas	
R4	Non-Retail Uses in Other City Centre Shopping Areas	
R5	Café Quarter	
R6	Retail Proposals in District Centres	A Health check on the centres will be required to highlight any concerns. Clarification as to the application of the needs and sequential test at the local scale is required, as well as reflecting whether the policies are meant for the urban area only.
R7	Non-Retail Uses In District Centres	
R8	Small Scale Retail Proposals	
R9	Change of Use to Non-Retail Uses Inside Local Centres	
R10	New Out of Centre Retail Sites	
R11	Development of Existing Out-of-Centre Retail Sites	Revision Necessary to all Out of Center Retail Policies – The level of vacancies, reduction in footfall numbers and pressure for out of town retail remains a concern. Policies to be reviewed to ensure this pressure is managed, as necessary.

Community Facilities & Other Infrastructure Policies		Commentary
CF1	Protection of Playing Fields, Land and Buildings Used for Leisure, Sport, Recreation and Play	Functioning effectively
CF2	Outdoor Play Space Requirements	Revision of calculations required to reflect revised level of housing growth over new plan period in relation to housing requirement and spatial strategy.
CF3	Water Based Recreation	Functioning effectively
CF4	Riverfront Access	Functioning effectively

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CF5	Usk and Sirhowy Valley Walks	Update to ensure this covers the requirement of PROW strategy
CF6	Allotments	Functioning effectively
CF7	Horse Related Developments	Functioning effectively
CF8	Tourism	Amendments required to consider what is defined as tourism, very permissive at present possible implications from temporary accommodation from housing stock.
CF9	Celtic Manor	Is a specify policy still necessary, can this be incorporated into CF8?
CF10	Commercial Leisure Developments	Amendments required to consider what is defined as commercial leisure developments
CF11	Outdoor Leisure Developments	Functioning effectively
CF12	Protection of Existing Community Facilities	Amendments required to consider what is defined as community facilities and where they are best located or how they can be protected if a private business.
CF13	School Sites	Functioning effectively

Minerals Policies		Commentary
M1	Safeguarding of Mineral Resource	Revision Necessary – AMR highlighted that further training is needed every year. Review whether category 2 minerals should be safeguarded.
M2	Mineral Development	Functioning effectively
M3	Oil and Gas	Question whether this policy goes beyond national policy
M4	Wharves and Rail	Functioning effectively

Waste Policies		Commentary
W1	Sites for Waste Management Facilities	Review to ensure adequate land supply to meet requirements of PPW.
W2	Waste Management Proposals	Review to ensure adequate land supply to meet local requirements.
W3	Provision for Waste Management Facilities in Development	Functioning effectively

Policy Topics noted as missing from the current plan:

- External space for Care Homes
- Guidance on lifetime homes and adaptation of homes

**Local Development Plan
Draft Delivery Agreement**

December 2020

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1. EXECUTIVE SUMMARY

- 1.1 The Local Development Plan (LDP) is about the future development of Newport, and the Council is keen to let everyone have a say in the development of the city. The first step has been to **agree a timetable** so people know when they can contribute, and when they can expect a response to their input. Chapter 3 sets out the Council's proposed timetable. Any individual or organisation can be involved in the shaping of the LDP, but community involvement is particularly encouraged through a **Community Involvement Scheme (CIS)**. More information on how the community can be involved is given in Chapter 4.

The Council is seeking your views on the matters set out in this Draft Delivery Agreement.

Please provide your comments before Xpm on X February 2021

A consultation response form is available to complete on the Council's website at www.newport.gov.uk/ldp or for a form to be sent to you please use one of the contact methods set out below.

- 1.2 A Local Development Plan has to be prepared according to the rules set down by Welsh Government. This means that the general soundness of the Plan will be decided by an independent inspector appointed by the Welsh Government. In setting out the process in this Delivery Agreement, maximum opportunity is given for input to the Plan and for consensus to be built as far as possible. It is important therefore to be involved early on and to put forward **your** views.
- 1.3 The inspector will be interested in all the evidence on each aspect of the Plan. The Plan cannot be prepared in a vacuum of course, and will need to take account of all relevant factors, including:
- existing development
 - the wider context, including neighbouring Authorities
 - planning policy guidance, regulations and other relevant plans and strategies from the Welsh Government
- 1.4 The Replacement Local Development Plan will be the key document for determining the sort of places in which we live, work and take our recreation. It will be a key means by which we look after the environment for the benefit of this and future generations. We hope that you will read this report and will take time to be involved in shaping the future of Newport: the city, the surrounding villages and countryside.
- 1.5 Please note that if you or your organisation are not already registered to be involved, you can do this through the Council's website: www.newport.gov.uk/ldp ,by email to ldp.consultation@newport.gov.uk , by telephoning 01633 656656 or by writing to the: Planning Policy Team, Room 707, Newport City Council, Civic Centre, Newport, NP20 4UR.

2. INTRODUCTION

2.1 The Newport Local Development Plan (LDP) was adopted by the Council on 27 January 2015 and sets out the Council's planning framework for the development and use of land in Newport over the period 2011 – 2026. To ensure that LDPs are kept up-to-date, local planning authorities are required¹ to commence a full review of their plans at least once every four years following plan adoption, or sooner if the findings of the Annual Monitoring Reports indicate significant concerns with a Plan's implementation. Newport City Council has produced a Draft Review Report that sets out the proposed type of review, i.e. full plan review, and those key factors for consideration for a replacement plan. Alongside the Review Report the Council is required to produce a Delivery Agreement which sets out the timetable and engagement strategy for the plan preparation. This Draft Delivery Agreement, once approved, will be submitted to Welsh Government and will be the basis for the production of Newport's replacement LDP. The replacement LDP will cover the period 2021-2036.

Purpose of a Delivery Agreement (DA)

2.2 This Delivery Agreement is an important part of the plan preparation process. It is an essential project management tool which sets out the processes of plan preparation, making clear the opportunities and methods of engagement required by legislation, regulations and Welsh Government guidance. It also sets out the resources and timescales involved. A glossary of terms can be found in Appendix 4. There are two key aspects to a DA:

1. Timetable

Setting out the preparation and adoption of the replacement LDP, Integrated Sustainability Appraisals, Annual Monitoring Reports and Supplementary Planning Guidance

2. Community Involvement Scheme (CIS)

Indicating how the Council will involve consultation bodies and the public in the preparation of the Plan

2.3 This document is the draft Delivery Agreement that has been made available for consultation. The document will be revised following the consultation period. Once the final draft is completed, this will be sent to Full Council for approval and following this, it shall be submitted to Welsh Government (WG) for agreement. Once agreed by WG, the Delivery Agreement will be made available on the Councils website and will be made available in hard copy at the Council's Information Station and/or the Newport Civic Centre (clearly indicated at the start of each key stage consultation).. A review of progress will be undertaken at each key stage of the replacement LDP (RLDP).

¹ Town and Country Planning (LDP) (Wales) Regulations 2005, as amended: S.41

Preparation of RLDP

- 2.4 In preparing the RLDP, the Council will aim to achieve the following key outcomes, in accordance with the Welsh Government LDP Manual (Edition 3, 2020):
- Support sustainable development and quality places based around the National Sustainable Placemaking Outcomes, being aligned with national policy set out in Planning Policy Wales (PPW) and integrated with an SA/SEA/HRA, including Welsh language and the requirements of the Well-being of Future Generations Act 2015.
 - Be based on and underpinned by early, effective and meaningful community involvement in order to understand and consider a wide range of views, with the aim of building a broad consensus on the spatial strategy, policies and proposals of the RLDP.
 - Be based on a robust understanding of the role and function of the Newport area including the functional linkages to areas beyond our administrative boundaries.
 - Be distinctive by having plans setting out clearly how Newport will develop and change, giving certainty for communities, developers and businesses.
 - Be resilient to climate change (using the latest UK climate projections, flood risk and vulnerability assessment data) and support the transition to a low carbon society in line with the latest carbon reduction targets and budgets as set out in the Environment (Wales) Act (Part 2). The principles of Placemaking, the Sustainable Transport Hierarchy and the Energy Hierarchy as set out in PPW must be adhered to.
 - Ensure the sustainable management of natural resources in accordance with the Environment (Wales) Act 2016 and other relevant legislation.
 - Deliver what is intended through deliverable and viable plans, taking into account necessary infrastructure requirements, financial viability and other market factors.
 - Be productive and responsive with plans, kept up-to-date and flexible to accommodate change.
- 2.5 The RLDP will be prepared with regard to a wide range of legislation, policies and other initiatives at the international, national, regional and local level. The Local Well-Being Plan (LWBP) will be of particular importance at the local level. The LWBP relates to the economic, social, environmental and cultural well-being of Newport and has clear links with the RLDP where it relates to land use planning.

Integrated Sustainability Appraisal & Habitat Regulations Assessment

- 2.6 An Integrated Sustainability Appraisal², (SA) incorporating Strategic Environmental Assessment³ (SEA) and Welsh Language Impact Assessment (LIA), is a statutory requirement of LDP preparation in order to assess the environmental, social and economic implications of the Plan's strategy and policies. The SA/SEA process is utilised to ensure that policies in the LDP reflect sustainable development principles and take into account the significant effects of the plan on the environment. SA, incorporating SEA, was an iterative process throughout the preparation of the adopted LDP and is reflected in the Plan's proposals and policies.

² Section 62 (6) Planning and Compulsory Purchase Act 2004

³ European Union Directive 2001/42/EC & Environmental Assessment of Plans and Programmes (Wales) Regulations 2004

2.7 The Council will undertake an Integrated Sustainability Appraisal (ISA) as set out above but shall broaden the scope of this integrated assessment to ensure that it also captures a few other impact assessments. This approach will assess the contribution the RLDP can make to the Well-Being Goals and ensures a collaborative approach on a variety of issues, recognising links between them and avoiding duplication of work. This holistic and integrated approach will ensure that as well as the SA, SEA and LIA (noted above) the integrated assessment will include as a minimum an Equalities Impact Assessment (EIA), Health Impact Assessment (HIA) and a clear understanding of how the Welsh well-being goals are influencing the plan. For future reference, the Integrated Sustainability Appraisal should be considered to include the broader assessments as noted above. The ISA process will run concurrently with the plan making process and forms an iterative part of plan preparation.

2.8 The ISA will be undertaken as follows:

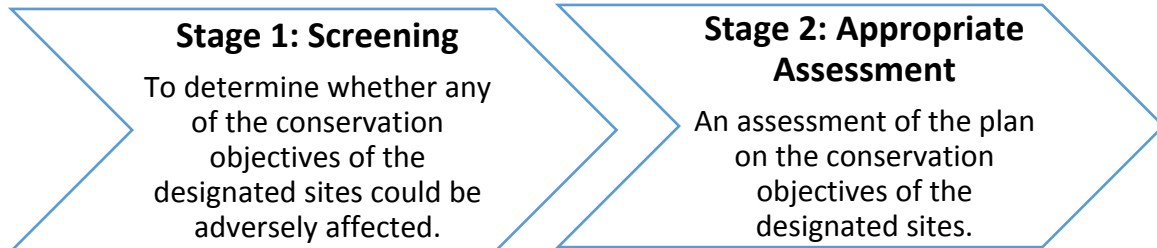
- An **Integrated Sustainability Appraisal Scoping Report** identifies the existing sustainability issues in the Newport area and provides baseline information along with a review of plans, policies, programmes and strategies. The existing SA indicators and objectives⁴ will be revised and updated as necessary. A revised Sustainability Framework will be produced.
- An **Initial Integrated Sustainability Appraisal Report (ISAR)** predicts and evaluates the effects of the LDP options, spatial strategy and strategic policies on the social, environmental and economic objectives as set out in the Scoping Report. The ISAR will be published at the same time as the Preferred Strategy and updated when the Deposit Plan is prepared.
- A **Final Integrated Sustainability Appraisal Report (SAR)**. This will bring together all elements of the ISA and take into account the binding recommendations of the Planning Inspector. The Final ISAR will be published following receipt of the Inspector's Report.
- An **Integrated Sustainability Appraisal Adoption Statement** will be published to explain how the sustainability considerations and the Sustainability Assessment have been taken into consideration in the production of the RLDP.

2.9 In addition to the ISA process, there is a requirement for the Council to also undertake a **Habitat Regulations Assessment (HRA)** as part of the plan preparation process. The Habitats Directive⁹ requires that land use plans, including LDPs, are subject to an additional Habitats Regulations Assessment where there are sites of European significance for nature conservation purposes. Newport contains European nature conservation designated sites including the River Usk Special Areas of Conservation and

⁴ <https://www.newport.gov.uk/en/Planning-Housing/Planning/Planning-policy/Local-Development-Plan/Sustainability-appraisal.aspx>

The Severn Estuary Special Protection Area and RAMSAR⁵ site. Habitats Regulations Assessment will be undertaken alongside ISA to ensure an integrated approach to assessment.

- 2.10 There are two stages to a Habitat Regulations Assessment, both of which are only required if stage 1 concludes there is the potential for adverse effects:



- 2.11 It is intended that the process will again run concurrently with the Plan making process and form an iterative part of Plan preparation.

Evidence Base

- 2.12 The Review Report sets out the need to update and undertake evidence base assessments throughout the plan preparation period. It is anticipated that the following assessments will be required as part of the RLDP process:

- Population and Household forecasts
- Local Housing Needs Assessment
- Employment Land Review
- Affordable Housing Viability Assessment
- Gypsy and Traveller Accommodation Needs Assessment
- Strategic Flood Consequence Assessment
- Retail and Leisure Study
- Green Infrastructure Assessment
- Renewable Energy Assessment
- Landscape Assessment

- 2.13 Please note this is not a definitive list and additional evidence base update requirements may emerge as the RLDP process progresses.

⁵ A **Ramsar site** is a **wetland site** designated to be of international importance under the **Ramsar Convention**. The **Convention on Wetlands**, known as the **Ramsar Convention**, is an intergovernmental environmental treaty established in 1971 by UNESCO, which came into force in 1975

Well-being of Future Generations (Wales) Act 2015

2.14 The Well Being of Future Generations (Wales) Act (WCFG) gained Royal Assent in April 2015. The Act aims to make a difference to the lives of people in Wales in relation to seven well-being goals and sets out five ways of working, as set out in figure 1 below:



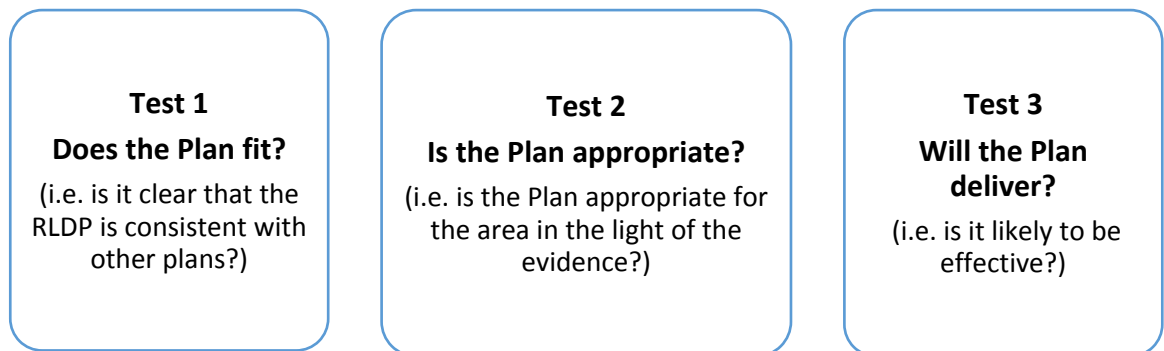
Figure 1: Well-Being Goals & Ways of Working

2.15 Given that sustainable development is the core underlying principle of the LDP (and ISA), there are clear associations between both the LDP and the WCFG Act. As a requirement of the Act, a Local Well-being Plan (LWBP) must be produced. This plan will look at the economic, social, environmental and cultural well-being of the city and will have clear links with the RLDP. The timescales for the development of an updated Well-Being Plan for Newport are anticipated to overlap and this will aid in the development of both plans.

Both the WCFG Act and the LWBP will be considered fully throughout the preparation of the RLDP, which will follow the five ways of working.

Tests of Soundness

- 2.16 The Replacement LDP will be submitted to the Welsh Government for examination. An independent Inspector is appointed by the WG to undertake this examination to determine whether the Plan is fundamentally sound. ‘Soundness’ is an integral part of the LDP system and is an important principle by which it may be demonstrated as to whether the LDP shows good judgement and is able to be trusted. If the RLDP is found not to be sound, then the Welsh Government will require the Council to take necessary action to remedy the situation.
- 2.17 At examination, the Inspector will assess whether the preparation of the plan has been undertaken in accordance with legal and regulatory procedural requirements and complies with the Community Involvement Scheme. The Inspector must also determine whether the Plan meets the three soundness tests⁶:



- 2.18 Following Examination, the Inspector will produce a report that sets out their findings and conclusions. The conclusions set out in the report will be binding and, unless the Welsh Government intervenes, the Council must accept the changes required by the Inspector and adopt the RLDP.

⁶ The tests of soundness can be found in the Welsh Government Local Development Plan Manual <https://gov.wales/development-plans-manual-edition-3-march-2020>

3. TIMETABLE

- 3.1. The Council must set out a timeline for plan preparation, setting out the various stages and documents and key stages of public consultation. The Welsh Government have set an expectation that a replacement LDP should not take longer than 3.5 years, plus one three-month slippage period. Newport has an adopted Local Development Plan (2015-2026) currently in operation and will continue to do so while the new plan (the replacement LDP) is prepared.
- 3.2. Table 1 sets out the key stages of plan preparation. A more detailed project plan is included in Appendix B. The timetable is split between Definitive and Indicative Stages. Stage 1-4 are noted as Definitive stages because the progression of these stages are in direct control of the Council. Every effort will be made to adhere to this timetable. Stages 5-8 are noted as indicative because these stages are dependent on various factors including the number of representations received during Deposit Plan consultation or the number of examination hearing sessions required. The Council has less control over these factors. Therefore, stages 5-8 will be reconsidered after reaching the Deposit stage of the plan where definitive timings will be prepared and submitted to the Welsh Government for agreement and publication.

Table 1: Summary Timetable

Key Stages		Definitive Timescales
Stage 1 Delivery Agreement	Public Consultation Full Council Approval and Submission to WG Approval from WG	January – March 2021 April 2021 May 2021
Stage 2 Pre- Deposit	Candidate Site Stage Consultation on Integrated Sustainability Appraisal Vision and Objective/Growth Options Prepare Preferred Strategy Full Council reporting Preferred Strategy	June – Sept 2021 June – August 2021 July 2021 – Jan 2022 Jan – July 2022 July 2022
Stage 3 Preferred Strategy	Public Consultation Prepare Deposit Plan Full Council reporting Deposit Plan	August - October 2022 January – August 2023 September 2023
Stage 4 Deposit Plan	Public Consultation Full Council approval for submission to WG	October – December 2023 April 2024
Indicative		Timescales
Stage 5	Submission	May 2024
Stage 6	Examination	June 2024
Stage 7	Inspector's Report	January 2025
Stage 8	Adoption	February 2025
		Total Plan Preparation 3.5 years (plus 3 months slippage period)

Resources

- 3.3. The Development Services Manager will be responsible for the overall delivery of the RLDP, with the Planning Policy Manager responsible for the day-to-day project management. The Planning Policy Team will lead in the preparation and delivery of the RLDP with Member engagement and political reporting at appropriate stages.
- 3.4. The staff resources are set out in Table 2 below, approximately 90-95% of officer time will be dedicated to the RLDP to account for day to day involvement in liaison with colleagues in development management and also to account for regional working.
- 3.5. Additional time will be dedicated by the Head of Regeneration Investment and Housing and the Development Services Manager to the efficient delivery of the RLDP. It will also be necessary to call upon staff resources from other internal departments to assist in undertaking various evidence base updates/assessments. This is likely to include officer support from: Development Management, City Services, Policy and Partnership, Housing, Highways, Regeneration and Economic Development, Education, Democratic Services and Legal Services.

Table 2: Indicative⁷ Planning Policy Team Structure

Officer Job Title	Number of posts
Planning Policy Manager	1
Principal Planning Policy Officer	1
Senior Planning Policy Officer	1
Planning Policy Officer	1
GIS and Technician	1

- 3.6 The Council recognises that additional professional specialist services will also be required to progress and establish a robust evidence base to inform the RLDP. While it is anticipated that a considerable amount of evidence base work will be undertaken by NCC officers, the use of external consultants will be necessary, particularly in relation to highly technical/specialist elements of the evidence base. Financial resources have been secured accordingly.
- 3.7 It is important to note that work is on-going on a regional basis and collaboration with neighbouring authorities will continue to be fundamental to the preparation of the RLDP, particularly with regard to a joint evidence base, where appropriate. The South East Wales Strategic Planning Group (SEWSPG) is working towards a set of regionally agreed methodologies for key topic areas to ensure a consistent evidence base throughout the Cardiff Capital Region. In addition, Monmouthshire, Torfaen, Blaenau Gwent, Newport and Caerphilly Councils have jointly procured a number of joint evidence base studies and future work joint work with these authorities and Cardiff are anticipated.

⁷ Business Case for proposed structure currently being considered

3.8 A dedicated budget has been made available to progress the RLDP to adoption within the proposed timetable. It is anticipated that this will cover expenditure relating to all elements of preparation of the RLDP and the Independent Examination.

Risk management and Analysis

3.9 The proposed timetable is considered to be realistic and achievable having regard to:

- The scope of work understood to be involved in plan preparation, having regard to the WG regulations and guidance;
- The resources the Council has committed to plan preparation; and
- The current structure of the Council, its decision-making structures and meeting cycles.

3.10 While every effort will be made to avoid deviation from this timetable, it is acknowledged to be challenging. Appendix D identifies a number of potential risks, together with the Council's proposed approach to managing them.

Supplementary Planning Guidance (SPG)

3.11 The RLDP will contain sufficient policies to provide the basis for determining planning applications. However, SPG has an important supporting role in providing more detailed or site-specific guidance on the way in which LDP policies will be applied. While SPG does not form part of a Development Plan it should be derived from and be consistent with the relevant LDP. The SPG should also be clearly cross referenced to the policies and proposals it supplements.

3.12 Since the adoption of the current LDP, 23 supplementary planning guidance (SPG) documents have been produced to support key LDP policy areas. It is anticipated that the SPG topic list below will continue to be relevant and necessary. Where these can be updated or revised as part of LDP process, to reflect the changes to the RLDP and its evidence base, this will be done. However, it is important to note that the SPG linked to the RLDP cannot be formally adopted until after the Inspector's Report has been received and there are no changes to the policy approach set out in the RLDP. It is not anticipated that any new or additional SPG will be prepared in parallel with the RLDP due to challenging timescales.

- Planning Obligations SPG
- Affordable Housing SPG
- Archaeology and Archaeologically Sensitive Areas SPG
- Wildlife and Development SPG
- House Extensions and Domestic Outbuildings SPG
- Mineral Safeguarding SPG
- Outdoor Play Space Provision SPG
- Trees, Woodland, Hedgerows and Development Sites SPG
- Air Quality SPG
- Caerleon **Conservation Area Appraisal** SPG

- New Dwellings SPG
- Flat Conversions SPG
- Waste Storage and Collection SPG
- Parking Standards SPG
- Housing in Multiple Occupation SPG
- Draft Shopfront Design SPG
- Sustainable Travel SPG
- Security Measures for Shopfronts and Commercial Premises SPG
- Stow Park **Conservation Area Appraisal** SPG
- Clytha **Conservation Area Appraisal** SPG
- The Shrubbery **Conservation Area Appraisal** SPG
- Draft City Centre Conservation Area Appraisal SPG
- Draft St Woolos Conservation Area Appraisal SPG

Monitoring and Review

3.13 The Council will continue to monitor and review progress of the RLDP against the requirements of the Delivery Agreement to ensure the timetable is being kept to and the public engagement as set out in the CIS is being met. As noted in paragraph 3.1, the timetable allows for a marginal degree of flexibility, however, any significant amendments to the DA will require approval by the Council prior to Welsh Government agreement. The DA may need to be amended if the following circumstances, which are beyond the LPA's control, occur during the preparation of the revised LDP:

- Significant change to the resources available to undertake preparation of the RLDP.
- Preparation of the RLDP falls behind schedule by more than 3 months at a key stage.
- Significant changes to Legislation directly affecting the RLDP preparation process.
- Any other circumstances that will materially affect the delivery of the RLDP.
- Significant changes to the Community Involvement Scheme.

3.14 An updated timetable will be submitted to WG following the Deposit stage. This will provide greater certainty on the timescale for the remaining stages (currently set out as indicative stages in Table 1). This indicative part of the timetable will be redefined within three months of the close of the formal Deposit period and will be submitted to WG for agreement.

4. COMMUNITY INVOLVEMENT SCHEME

4.1 The Community Involvement Scheme (CIS) sets out how the Council proposes to proactively involve the community and other stakeholders in the preparation of the Replacement Local Development Plan (RLDP). Whilst it is the responsibility of the Council to produce the RLDP, one of the aims of the development plan system is to produce a plan based on effective community involvement. This process of building consensus on the context of the RLDP is a key aspect of this CIS and the five ways of working prescribed by the Well-Being of Future Generations Act. The following section sets out the ways in which you and other interested parties can influence the RLDP. The opportunities for involvement for each key stage of the plan preparation process are set out below; this should be read in conjunction with the timetable set out in Chapter 3 and Appendix 1).

4.2 Welsh Government set out in 2011 a set of ten national principles for public engagement. They are a set of non-statutory principles and are designed to provide guidance when undertaking the engagement and participation process. They are an overarching set of principles aimed at public service organisations across all sectors in Wales. The Principles for Public Engagement for Wales are:

1. Engagement is effectively designed to make a difference
2. Encourage and enable everyone affected to be involved, if they so choose
3. Engagement is planned and delivered in a timely and appropriate way
4. Work with relevant partner organisations
5. The information provided will be jargon free, appropriate and understandable
6. Make it easier for people to take part
7. Enable people to take part effectively
8. Engagement is given the right resources and support to be effective
9. People are told of the impact of their contribution
10. Learn and share lessons to share the process of engagement

It is considered appropriate to utilise these principles in the preparation of the RLDP. This is reflected in this document and engagement will take place in accordance with the guidelines set out in this CIS.

Who will we involve?

4.3 Effective involvement of people and communities and collaboration with other organisations are two of the five ways of working set out in the Well-Being of Future Generations Act and are a key aspect in the preparation of the RLDP. The Council will seek to involve the following groups in the plan preparation:

Members of the public, businesses, landowners, developers and agents

4.4 The Council has a RLDP database which is being maintained to include details of any parties who have requested to be kept informed of the Replacement LDP process. This database allows contact with groups beyond those set out in regulations.

4.5 Extensive engagement will be undertaken at each key stage of the RLDP process. Efforts will be made to engage with communities, businesses, local organisations, landowners, and

developers to ensure a broad range of feedback. We shall engage with a variety of interest groups including community councils, the citizens panel, chambers of commerce, planning agents, prospective developers and groups including local wildlife trusts, community groups and young people.

- 4.6 The call for candidate sites will provide the opportunity for those who have an interest in land to submit sites to be considered for development. We will be making one formal call for candidate sites and all candidate sites will need to be submitted via a standardised form. The forms contain the criteria required to assist in the assessment of the suitability of sites for inclusion as potential allocations in the RLDP. Accordingly, all submissions must be made at the appropriate time, the dates of which will be advertised extensively using the methods set out below.
- 4.7 The RLDP database automatically keeps a record of any party who has provided representations to the RLDP process. By providing representations or requesting to be added to the database those parties are giving their consent for their details to be held by the Council for the RLDP process. If you would like to be added to the RLDP database, please contact the planning policy team using the details set out in section 4.22.

Elected Members

- 4.8 Newport elected members will play an important role in the RLDP process by, informing the policy team of issues and opportunities within Newport and their local areas as well as continuing to represent their local communities. Consequently, member seminars will be undertaken where appropriate, anticipated to be at the key stages of the RLDP development.

Community Councils

- 4.9 Community Councils play a key role in disseminating information within their local area and will be a key link in effective involvement within their local areas. Community Councils will be consulted at every stage of the RLDP process and they are encouraged to take this opportunity to raise awareness of this to their local communities. Community Councils are also a source of information for RLDP development and are also encouraged to provide issues and opportunities for their areas including any land use based aspirations.

Partnership groups

- 4.10 Liaison with Newport's Public Service Board⁸ will be of particular importance to ensure that the RLDP aligns with the Local Well-Being Plan. The PSB also represents a broad coverage of interested parties and their involvement in the RLDP process will aid the RLDP through the provision of data and evidence base as well as broadening the scope of engagement with parties that have had limited or no contact with the development plan process in the past, but with an interest in Newport.

Additional Consultation Bodies

⁸ <http://www.newport.gov.uk/oneNewport/Well-being-of-Future-Generations-Act/Public-Services-Board.aspx>

4.11 Appendix A provides a list of the specific and general consultation bodies⁹ along with UK Government departments and other consultees. The specific consultees comprise of the Welsh Government and those bodies with specific functions that apply to the revised Plan area, for example the Aneurin Bevan Health Board. The Authority must also consult UK Government Departments where aspects of the plan appear to affect their interests. These consultation bodies will be engaged throughout the RLDP process at each of the formal stages and informally, as appropriate.

Hard to Reach Groups

4.12 Hard to reach groups and those that are seldom heard are those groups who have not taken part traditionally in the plan preparation process. Additional effort will therefore be required to ensure these groups are engaged in the RLDP process. A flexible approach will need to be undertaken in relation to engagement with these groups, albeit within the parameters of the specified participation/consultation periods. Engagement with these groups may be achieved by using existing partnerships and groups wherever possible. It is nevertheless recognised that the very principle of a hard to reach group is that they may not be involved in existing groups and that this may not therefore always be achievable. Trusted intermediaries will also be used, as appropriate, in order to gain the views of particular groups of people who do not have the confidence to engage directly in the process.

4.13 The following groups are identified as not having been sufficiently engaged in plan preparation previously and will subsequently be actively encouraged to participate in the RLDP process:

- Young People – Newport’s Youth Council will be invited to participate as appropriate in the RLDP process. The RLDP covers a fifteen-year period and as such the plan is as relevant and will have a direct impact on young people. It is therefore considered key that the voices of young people are heard so that they can share their views on their local area.
- Disabled People – we will seek to engage with an appropriate stakeholder group(s) at relevant stages, in order to gain the views of those living with disabilities in Newport.
- Gypsy and Travellers – we will seek to engage with an appropriate stakeholder group(s) at relevant stages to ensure the gypsy and travelling community are suitably engaged.
- Black and Minority Ethnic (BME) People – we will seek to engage with appropriate BME stakeholder group(s) are suitably engaged at relevant stages of the plan.

4.14 In addition to the above hard to reach groups, there are other seldom heard voices who are considered to have been under-represented previously in LDP preparation. This

⁹ Those Specific and General Consultation bodies as set out in LDP Regulations.

includes (but is not exclusive to) those seeking affordable housing in the County, agricultural related development, small/self-build house-builders and small and medium-sized enterprises. Accordingly, we will endeavour to reach out to these groups by utilising existing mutual points of contact wherever possible.

How will we involve you?

4.15 We will seek to publicise the RLDP process at every stage and reach as much of the community as possible, as set out in the section above, to inform people about the RLDP stage and how they can get involved. This will be done by:

- Direct contact (i.e. by letter or e-mail, the preference of which as indicated by the stakeholder through consultation, together with language preference).
- Via Newport Council's Social Media Accounts and use of Bus wifi.
- Engagement with Members through specific workshops, Member drop-in sessions and in reports to appropriate Council meetings.
- Making use of existing networks such as Newport's Citizens Panel, Youth Council, Cohesive Communities Team.
- All RLDP information and documents will be made available on the Council's website.
- Deposit of documents at the Council's Information Station and or Civic Centre.
- Press releases where appropriate, including the use of Newport Matters.
- Public information exhibitions, engagement sessions and meetings will be undertaken face to face when possible when taking into account Welsh Government guidance on such matters. Virtual engagement and consultation via web based technological tools such as webinars will also be utilised.

Welsh Language and Bilingual engagement

4.16 The Welsh Language Standards place a legal duty on Councils to make it easier for people to use services through the medium of Welsh. The Council has published a Welsh Language Strategy (2017-2022) which sets out a vision that 'the people of Newport can use Welsh in all parts of life'. The requirements of both the corporate strategy and Welsh Language Standards will be maintained at each stage of the RLDP. Bilingual engagement will be carried out in the following ways:

- We welcome correspondence in both Welsh and English. Where correspondence is received in Welsh and a reply is necessary, this will be sent in Welsh.
- All comments forms, public notices will be bilingual. Stakeholders on the RLDP database will be sent RLDP correspondence in their preferred language.
- Any pages on the Replacement Local Development Plan website and social media posts will be bilingual.

What we expect from you

- 4.17 In order to ensure any comments and representations on the RLDP are considered, they must be submitted within the prescribed timescales. Chapter 3 of this Delivery Agreement sets out the timetable of relevant stages and provides a guideline of when we will seek your involvement. This will ensure that individual views are considered and taken into account throughout the RLDP preparation process.
- 4.18 It is also of importance that you notify the Planning Policy team should your contact details change during the RLDP process in order for us to keep you fully informed of progress. With regard to Candidate Sites, it is noted that land ownership changes may also occur during the process and it is imperative that these are communicated to the Planning Policy Team in order to ensure progress is not delayed.

Building Consensus

- 4.19 The Council will seek to build consensus through the various engagement and consultation methods set out within the CIS. Consensus building can only be achieved if the community and other interested parties are kept fully informed and effectively engaged throughout the preparation of the RLDP, which will be of particular importance in the early stages of plan preparation. It is nevertheless recognised that there will be occasions where consensus cannot be achieved and a difference in opinion between certain parties occurs. A clear audit trail of decisions will be maintained in order to ensure that there is transparency in the decision making process, and, to provide assurances to those that disagree, that the decisions have been made in an informed and balanced way.

Late Representations

- 4.20 The RLDP preparation process is subject to statutory and non-statutory consultation periods which have defined periods for representations to be made. Responses are required to be submitted to the Council by the specified deadline of the specific consultation period in order for them to be considered. Any late comments/representations will not be logged as 'duly made' as they were not made in accordance with the published timescales. In exceptional circumstances it will be at the Council's discretion as to whether such late representations can be accepted. Evidence will be required to highlight why the representation was delayed and that a genuine attempt was made to submit within the prescribed deadline. Please use the contact details set out below to inform us of any such event. The timescale to produce the RLDP continues to be challenging, the acceptance of late representations could result in further delay which would not be acceptable.

Availability of Documents

- 4.21 The RLDP documents will be made available at each of the relevant stages. All documents will be available electronically on the Planning Policy pages of the Council's website at <http://www.newport.gov.uk/ldp>. The RLDP webpage will have a link to online consultation forms which can be used to make and view representations on various documents relating to the Plan. In addition to online availability, the documents will also be available in paper copy

at the Council's Information Station and/or the Newport Civic Centre (clearly indicated at the start of each key stage consultation). As a result of the Covid-19 pandemic and potential future lockdown situations, it might be necessary to book appointments to view a paper copy. The location of paper copies and the process for viewing them will be clearly set out at the start of any consultation.

Our Contact Details

- 4.22 For more information on the Replacement Local Development Plan please visit www.newport.gov.uk/ldp
- 4.23 If you would like to contact a member of the Planning Policy Team, please use one of the following methods:
- **Email:** ldp.consultation@newport.gov.uk
 - **Telephone:** 01633 656656
 - **Post:** Planning Policy, Newport City Council, Civic Centre, Newport, NP20 4UR

Timetable and proposed Method of Engagement

- 4.24 Tables 3 & 4 sets out the detailed timetable for community engagement and the proposed engagement methods for the key stages in the RLDP preparation process. The list is not exhaustive and may be adapted to ensure the community and stakeholders are suitably involved at each stage. The proposed methods of engagement will vary dependent on the stage of plan preparation, subject matter, preference of those involved and the resources available at the time, recognising that the proposed timetable and methods should not hinder plan preparation.
- 4.25 Figure 1 sets out a summary of the process and indicates where engagement will occur, and feedback provided. It is worth noting that each stage of the RLDP process influences the next stage. The Integrated Assessment work informs and influences the output of each stage.

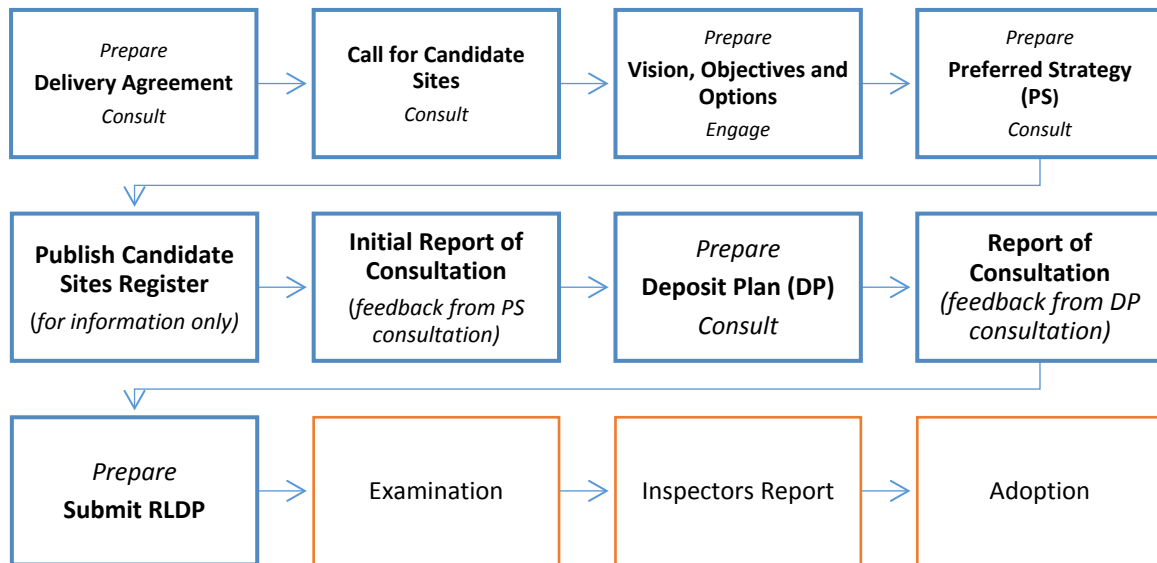


Figure 2: Summary of RLDP process, including engagement and feedback points

4.26 In light of the Covid-19 pandemic, method of engagement will need to reflect the Coronavirus Regulations (2020) and Ministerial advice. Should restrictions still be in place during a key consultation stage, arrangements will need to be made to ensure social distancing measures and other adjustments can be put in place when conducting public engagement events to ensure the safety of our colleagues and our communities. The use of digital involvement options to provide communities with information and the ability to engage with the RLDP in a virtual manner will be utilised. Details of the nature of each consultation period and the arrangements for the methods for engagement will be made clear on the Council’s website and correspondence sent to those on the RLDP database. It is anticipated that a mixture of public event and virtual engagement mechanisms will be utilised throughout the plan preparation process.

Table 3: Community Involvement timetable and proposed methods of engagement -Definitive Stages

Key Stage	Purpose	Consultation Period	Who will be involved	Method of engagement	Outcomes / Reporting Method	LDP Regs ¹⁰
Delivery Agreement	To set out timetable for plan preparation and process and methods of community engagement	January 2021 – March 2021	<ul style="list-style-type: none"> ▪ Specific Consultation Bodies ▪ General Consultees ▪ Registered LDP database ▪ Elected Members ▪ Community Councils ▪ General Public ▪ Public Service Board 	<ul style="list-style-type: none"> • Email • Letter • Website • Social Media • Press Release 	<ul style="list-style-type: none"> • Draft DA approval for consultation Cabinet Dec 2020 • DA approval for submission to WG 2021 	2005 Regs: 9 & 10 2015 Regs: 2 (5)
Review and Update Evidence Base	To inform the RLDP strategy and policy framework	Any update or new evidence base will be reported and made available for comment at the Growth Options, Preferred Strategy and	<ul style="list-style-type: none"> ▪ Local Authority Departments ▪ Members ▪ Neighbouring LPAs ▪ Consultants ▪ Statutory Consultees 	<ul style="list-style-type: none"> • Email • Letter • Website • Social Media • Press Release • Workshops/Meetings 	<ul style="list-style-type: none"> • RLDP AMR • RLPD Topic Papers • Technical Reports and Studies 	2005 Regs: 11

¹⁰ The Town and Country Planning (Local Development Plan) (Wales) Regulations 2005 & 2015

Key Stage	Purpose	Consultation Period	Who will be involved	Method of engagement	Outcomes / Reporting Method	LDP Regs ¹⁰
		Deposit Plan stage (see below)				
Call for Candidate Sites	To establish land availability, by establishing those areas which landowners are seeking to release land for development in order to identify potential development sites	June 2021-August 2021	<ul style="list-style-type: none"> ▪ All representors within the RLDP database, including ▪ Landowners ▪ Agents ▪ Developers ▪ HBF ▪ Federation of Small housebuilders ▪ General Public 	<ul style="list-style-type: none"> ▪ Email ▪ Letter ▪ Website ▪ Social Media ▪ Press Release 	<ul style="list-style-type: none"> ▪ Candidate Sites Register 	2015 Regs: 2 (1)
Review and Update ISA ¹¹ baseline and framework	To update the baseline information and define a new ISA framework	June 2021-August 2021	<ul style="list-style-type: none"> ▪ All representors within the RLDP database, including ▪ Specific Consultation Bodies ▪ Neighbouring Authorities ▪ SA/SEA consultees 	<ul style="list-style-type: none"> ▪ Email ▪ Letter ▪ Website ▪ Social Media ▪ Press Release ▪ Workshop/Meeting 	<ul style="list-style-type: none"> ▪ Report as part of ISA Scoping Report (see below) 	

¹¹ Integrated Sustainability Appraisal, see section 2.6 for further details

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Key Stage	Purpose	Consultation Period	Who will be involved	Method of engagement	Outcomes / Reporting Method	LDP Regs ¹⁰
<ul style="list-style-type: none"> Review Vision, Issues and Objectives Develop Growth Options ISA and HRA scoping work to be reported as part of ISAR (see below) 	To develop consensus on options including growth levels and spatial distribution to inform the Preferred Strategy (see below)	July 2021- January 2022		<ul style="list-style-type: none"> Email Letter Website Social Media Press Release Workshops/Meetings 	<p>Documentation made available on the Council's website.</p> <p>Draft Preferred Strategy and Initial Integrated Assessment Report and Initial HRA Scoping Report.</p>	2005 Regs: 14
Preferred Strategy Consultation	To enable anyone to make representations to the Councils pre-deposit document	August 2022 – October 2022	<p>All representors within the RLDP database, including</p> <ul style="list-style-type: none"> Specific and General Consultation Bodies Neighbouring Authorities General Public Hard to Reach Groups Community Councils 	<ul style="list-style-type: none"> Email Letter Website Social Media Press Release Exhibitions/ Workshops/ Meetings 	Initial Consultation Report	<p>2005 Regs: 15 &16</p> <p>2015 Regs:16A</p>

Key Stage	Purpose	Consultation Period	Who will be involved	Method of engagement	Outcomes / Reporting Method	LDP Regs ¹⁰
			<ul style="list-style-type: none"> Public Service Board 			
Initial Integrated Sustainability Appraisal Report (IASR) and HRA Scoping Report Consultation	To enable anyone to make representations to the Council's Scoping Report and ISAR	August 2022 – October 2022	All representors within the RLDP database, including <ul style="list-style-type: none"> Specific and General Consultation Bodies SA/SEA Statutory Consultees Neighbouring Authorities General Public Hard to Reach Groups Community Councils Public Service Board 	<ul style="list-style-type: none"> Email Letter Website Social Media Press Release Workshops/ Meetings 	Initial Consultation Report	2005 Regs: 15 &16 2015 Regs:16A
Deposit Plan Consultation	To enable anyone to make representations to the Council's Replacement Deposit LDP and consider any	October 2023- December 2023	All representors within the RLDP database, including <ul style="list-style-type: none"> Specific and General Consultation Bodies 	<ul style="list-style-type: none"> Email Letter Website Social Media Press Release Workshops/ Meetings 	Hard copies of representations placed in Information Station and or Civic Centre and made available on Councils website Updated Consultation Report	2005 Regs: 17, 18 & 19

Key Stage	Purpose	Consultation Period	Who will be involved	Method of engagement	Outcomes / Reporting Method	LDP Regs ¹⁰
	representations made on Deposit Plan		<ul style="list-style-type: none"> • Neighbouring Authorities • General Public • Hard to Reach Groups • Community Councils Public Service Board			
Integrated Sustainability Appraisal Report (IASR) and HRA Report Consultation	To enable anyone to make representations to the Councils ISAR and HRA Report and consider any representations made on ISAR and HRA reports	October 2023- December 2023	All representors within the RLDP database, including <ul style="list-style-type: none"> • Specific and General Consultation Bodies • SA/SEA Statutory Consultees • Neighbouring Authorities • General Public • Hard to Reach Groups • Community Councils • Public Service Board 	<ul style="list-style-type: none"> • Email • Letter • Website • Social Media • Press Release • Workshops/ Meetings 	Hard copies of representations placed in Information Station and or Civic Centre and made available on Councils website Updated Consultation Report	2005 Regs: 17, 18 & 19

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Table 4: Community Involvement timetable and proposed methods of engagement - Indicative Stages

Key Stage	Purpose	Anticipated Timescale	Who will be involved	Method of engagement	Outcomes / Reporting Method	LDP Regs
Submission of RLDP to WG for examination	To enable examination of RLDP	May 2024	All representors within the RLDP database, including specific and general consultation bodes. Elected Members	<ul style="list-style-type: none"> Email/Letters Website Copies of relevant supporting documents available at the Information Station and or Civic Centre and on the Councils website 	Submission to WG for examination	2005 Regs: 22 2015 Regs: 2 (17)
Independent Examination: <ul style="list-style-type: none"> Notification of Independent Examination Pre Examination Meeting Consideration of all representation to ethe RLDP MACs 	<ul style="list-style-type: none"> To ensure that interested parties are aware that an Independent examination of the RLDP is taking place To advise on examination procedure To provide an impartial planning view on the soundness of 	June 2024 – September 2024	<ul style="list-style-type: none"> All representors within the RLDP database, including specific and general consultation bodes. Elected Members All those interested parties that have made representations at the Deposit State of the RLDP. 	<ul style="list-style-type: none"> Email/Letter Notice placed on website Round Table Discussions Formal Hearing sessions (if requests and agreed by Inspector Written submissions 	Statements of Common Ground and papers as necessary Inspectors Report	2005 Regs: 23

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Key Stage	Purpose	Anticipated Timescale	Who will be involved	Method of engagement	Outcomes / Reporting Method	LDP Regs
	the RLDP, and the representations made in respect of it					
Publication of Inspector's Report <ul style="list-style-type: none"> Inform interested parties of receipt and publication of Inspector's report 	To make the Inspector's Report of the examination of the RLDP publicly available	January 2025	All representors within the RLDP database, including <ul style="list-style-type: none"> Specific and General Consultation Bodies Neighbouring Authorities General Public Elected Members Public Service Board 	<ul style="list-style-type: none"> Council Website Formal notification by email/letter Press Release 	Binding Inspector's Report	2005 Regs: 24
Publication of Environmental Reports	Identifying any adjustments arising from the Examination	January 2025	All representors within the RLDP database, including <ul style="list-style-type: none"> Specific and General Consultation Bodies Neighbouring Authorities 	<ul style="list-style-type: none"> Council Website Formal notification by email/letter Press Release 	Environmental Reports	2005 Regs: 25 2015 Regs: 2 (19)

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Key Stage	Purpose	Anticipated Timescale	Who will be involved	Method of engagement	Outcomes / Reporting Method	LDP Regs
			<ul style="list-style-type: none"> • General Public • Elected Members • SA/SEA statutory consultees • Public Service Board 			
<p>Adoption of RLDP</p> <p>The adoption of the RLDP is to take place within 8 weeks of receipt of the Inspectors Report</p> <p>This will include publication of a ISA adoption statement</p>	To inform stakeholders of adoption	February 2025	<p>All representors within the RLDP database, including</p> <ul style="list-style-type: none"> • Specific and General Consultation Bodies • Neighbouring Authorities • General Public • Elected Members • Public Service Board 	<ul style="list-style-type: none"> • Council Website • Formal notification by email/letter • Press Release 		<p>2005 Regs: 25</p> <p>2015 Regs: 2 (19)</p>

APPENDIX A: RLDP CONSULTATION BODIES

Specific consultation bodies

(as defined in LDP Regulations 2, including UK Government Departments)

A1.1 The Council will consult the following specific consultation bodies at all stages in the preparation of the RLDP.

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

Neighbouring Local Authorities:

- Caerphilly County Borough Council
- Cardiff City Council
- Monmouthshire County Council
- Torfaen County Borough Council

Community Councils:

- Bishton Community Council
- Coedkernew Community Council
- Goldcliff Community Council
- Graig Community Council
- Langstone Community Council
- Llanvaches Community Council
- Llanwern Community Council
- Marshfield Community Council
- Michaelston-y-fedw Community Council
- Nash Community Council
- Penhow Community Council
- Redwick Community Council
- Rogerstone Community Council
- Wentlooge Community Council

General Consultation Bodies:

A 1.2. The Council will consult the following general consultation bodies, where appropriate, in accordance with the delivery agreement. The List is not exhaustive and may be added to as appropriate:

a) Voluntary Bodies whose activities benefit any part of the authority's area:

- Gwent Association of Voluntary Organisation
- Caerleon Civic Society
- Campaign for the Protection of Rural Wales, Newport and Valleys Branch
- Citizens Advice Bureau Newport City Council
- Duffryn Community Link
- Echo Stow Hill
- Friends of the Earth Cymru
- Gwent Ornithological Society
- Gwent Wildlife Trust
- Fields in Trust
- Newport Civic Society
- Pentrepoeth Action Group
- Planning Aid Wales
- Severn Estuary Partnership
- Sustrans
- The Ramblers' Association
- The Royal Society for the Protection of Birds
- Always Community Association
- Wildlife in Newport Group

b) Bodies representing the interests of different racial, ethnic or national groups in the authority's area:

- South East Wales Racial Equality Council
- Gypsies and Travellers Wales
- Travelling Ahead
- Black Environment Network
- Gwent Education Minority Ethnic Service

c) Bodies which represent the interest in different religious groups in the authority's area:

- Churches in Newport
- Community Connector Service – Faith Groups

d) Bodies which represent the interest of disabled persons in the authority's area:

- Disability Wales
- Newport Access Group
- Guide Dogs for the Blind Organisation
- Mind Cymru
- Gwent Association for the Blind
- Royal National Institute for Deaf People

- Wales Council for Deaf People
- Wales Council for the Blind
- Wales Council for the Disabled

e) Bodies which represent the interest of people carrying out business in the authority's area:

- Newport and Gwent Enterprise Agency
- South East Wales Energy Agency
- Business in the community
- Charter Housing
- Pobl
- Linc Cymru
- Newport City Homes
- Coleg Gwent
- University of South Wales
- Farmers Union Wales
- Federation of Master Builders
- Home Builders Federation
- Local Transport Operators
- South Wales Chamber of Commerce
- Newport Chamber of Trade
- Mineral Products Association
- Confederation of British Industry (Wales)
- Welsh ICE

f) Bodies which represent the interest of Welsh culture in the authority's area:

- Glamorgan Gwent Archaeological Trust
- Arts Council of Wales
- National Museum of Wales
- Newport Museum
- Friends of Newport Ship
- National Trust
- National Roman Legion Museum
- Royal Commission for Ancient Monuments
- Stow Park Conservation Society

g) Bodies which represent the interest of difference age groups in the authority area:

- Age Cymru
- 50+ Forum
- Newport Carers Forum
- Newport Youth Council
- Yr Urdd

h) Bodies which represent the interest of lesbian, gay, bisexual, and transgender groups in the authority's area:

- Umbrella Cymru

- Stonewall Cymru

i) Bodies which represent the interest of Welsh language in the authority's area:

- Welsh Language Forum
- Menter Iaith Caesnewydd

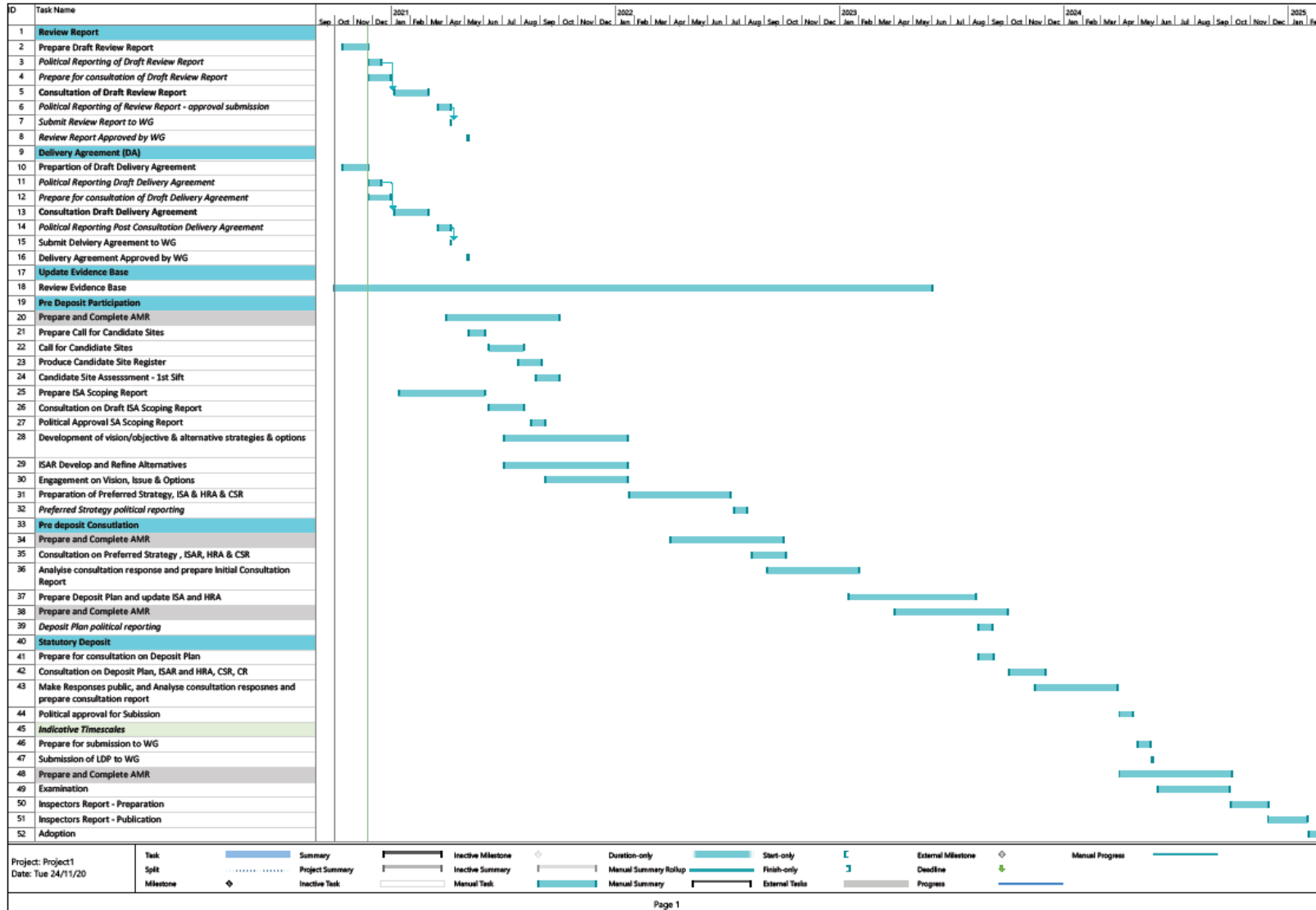
Other Consultees

A 1.3. The Council will consult the following other consultees, where appropriate, in accordance with the Delivery agreement. This list is not exhaustive and may be added to as appropriate:

- Arts Council of Wales
- British Horse Society
- Bus Users Cymru
- British Geological Society
- Campaign for Real Ale
- Campaign for the Protection of Rural Wales
- Capital Region Tourism
- Chartered Institute of Housing (Cymru)
- Chartered Management Institute (Cymru)
- Children's Commissioner for Wales
- Civil Aviation Authority
- Civic Trust Cymru
- Coed Cymru
- Coleg Gwent
- Community Transport Association
- Confederation of Passenger transport
- Crisis
- Crown Estate
- Design Commission for Wales
- District Valuer Services
- Fire and Rescue Service
- Freight Transport Association
- Future Generations Commissioner for Wales
- Gwent Police
- Heritage Amenity Societies, including The Victorian Society, The Georgian Group, Twentieth Century Social, CBA, Historic Gardens Trust.
- Home Builders Federation
- Institute of Civil Engineers
- Mineral Products Association
- National Farmers Union
- Newport's Citizen Panel
- Newport Harbour Commissioners
- Newport Housing Trust
- One Voice Wales
- Open Spaces Society
- Planning Aid Wales
- Planning Inspectorate
- Public Health Wales

- Rail Freight Group
- Ramblers Cymru
- Road Haulage Association Ltd
- Royal Institute of Chartered Surveyors
- Royal Mail
- Royal Town Planning Institute Cymru
- RSPB Cymru
- Shelter Cymru
- Society for the Protection of Ancient Buildings
- South Wales Trunk Road Agency
- South Gwent Ramblers Association
- Sports Wales
- Stagecoach
- Sustrans Cymru
- The Energy Savings Trust
- The National Trust
- The National Library of Wales
- The Older Peoples Commissioner for Wales
- The Theatres Trust
- The Woodland Trust
- Transport for Wales
- Visit Wales (Welsh Tourist Board)
- Wales Council for Voluntary Action
- Welsh Language Commission
- Gwent Wildlife Trust
- WWF Cymru

APPENDIX B: RLDP TIMETABLE



APPENDIX C: RLDP RISK MANAGEMENT

Issue	Potential Risk(s)	Mitigation	Probability / Impact
Council Issues			
Change in staff resources available to assist with RLDP preparation.	Programme Slippage	Ensure process maintains high level corporate priority and carry through staff recruitment and retention where necessary	Medium / High
Reduction and lack of financial resources.	Programme Slippage	Monitor Plan expenditure and ensure plan preparation is adequately costed.	Medium / High
Organisational restructuring	Programme Slippage	Ensure process maintains high level corporate priority	Medium/Medium
Council decision making structure/ political reporting cycle.	Programme Slippage	Timetable consulted on and special dates can be requested if required	Medium/Medium
Political Change/ Elections.	Programme Slippage	Undertake early Member training	Medium/Medium
Lack of consensus throughout the organisation and/ or lack of support from officers/other departments in production of the evidence base.	Programme Slippage	Ensure organisation wide support of process at outset	Low/Medium
Local Issues			
Large volume and /or highly significant levels of objection to proposals e.g. site allocations.	Programme Slippage. The next stage of the plan process cannot be undertaken without significant work	Ensure liaison with early involvement of stakeholders throughout the plan preparation process	Medium/Medium
Additional requirements arising from new legislation and/or national guidance. E.g. general	Programme Slippage	Monitor emerging legislation and guidance and ensure involvement of	Medium/High

conformity with the adopted NDF, alignment with revised Planning Policy Wales and LDP Manual, revised TAN15.		progression of such work.	
Insufficient information to undertake ISA/SEA.	Programme Slippage	Identify and manage expectation of consultation bodies. Consider additional resourcing	Medium/Medium
Impact from ISA /HRA	Programme Slippage	Ensure the processes are fully integrated with plan preparation process	Low/Low
Legal Challenge.	Programme Slippage. Plan quashed.	Ensure correct procedures followed, consistency with WG guidance and creation of sound evidence base	Low/Medium
Regional and National Issues			
Direction from Welsh Government Cabinet Secretary to prepare a Joint Plan.	Plan preparation would halt and a new plan process begun from the start	None, the Council would be expected to engage with the WG if such an event occurred	Medium / High
Ability of statutory consultees and/or Planning Inspectorate to respond within set timescales.	Programme Slippage Delay of examination and/ or Inspectors Report.	Maintain liaison with statutory consultees and the Planning Inspectorate to ensure identification of potential problems.	Low/Medium
Plan fails the test of 'soundness'.	Plan cannot be adopted without additional work. This could lead to part of plan being excluded or change or withdrawal of the plan.	Ensure robust evidence base, ISA and HRA correctly carried out, and appropriate procedures followed and documented.	Low/High

APPENDIX D: GLOSSARY

AMR	Annual Monitoring Report
BME	Black and Minority Ethnic
CCR	Cardiff Capital Region
DA	Delivery Agreement
PCPA	Planning and Compulsory Purchase Act
LDP	Local Development Plan
RLDP	Replacement Local Development Plan
NDF	National Development Framework
ONS	Office of National Statistics
PPW	Planning Policy Wales
PSB	Public Service Board
ISA	Integrated Sustainability Appraisal
SEA	Strategic Environmental Assessment
SEWSPG	South East Wales Strategic Planning Group
TAN	Technical Advice Note
WG	Welsh Government