

Agenda



Cabinet

Date: Wednesday, 13 September 2023

Time: 9.30 am

Venue: Hybrid / Council Chamber

To: Councillors J Mudd (Chair), D Davies, D Batrouni, J Clarke, Y Forsey, D Harvey, J Hughes, L Lacey and S Marshall

Item	Wards Affected
1	<u>Apologies for Absence</u>
2	<u>Declarations of Interest</u>
3	<u>Minutes of the Last Meeting</u> (Pages 3 - 12)
4	<u>Revenue Budget Monitor</u> (Pages 13 - 28)
5	<u>Capital Budget Monitor</u> (Pages 29 - 50)
6	<u>Demolition of Millbrook Primary School</u> (Pages 51 - 72)
7	<u>Replacement Local Development Plan</u> (Pages 73 - 448)
8	<u>Corporate Risk Register Update (Quarter 1)</u> (Pages 449 - 494)
9	<u>Climate Change Annual Report</u> (Pages 495 - 566)
10	<u>NCC External Pressures - Cost of Living</u> (Pages 567 - 572)
11	<u>One Newport - Summary of Business</u> (Pages 573 - 574)
12	<u>Work Programme</u> (Pages 575 - 582)

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Date of Issue: 6 September 2023

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Minutes

Cabinet

Date: 12 July 2023

Time: 4.00 pm

Present: Councillors J Mudd (Chair), D Davies, D Batrouni, J Clarke, Y Forsey, D Harvey, J Hughes, L Lacey and S Marshall

1 Apologies for Absence

None received.

2 Declarations of Interest

None received.

3 Minutes of the Last Meeting

Minutes from 14 June 2023 were accepted as a true record.

4 2022/23 Revenue Budget Outturn

The Leader introduced the first report on the agenda, which explained the Council's outturn for its 2022/23 revenue budget and the key issues arising.

Against a net budget of £343million, the 2022/23 revenue outturn produced a net underspend, after planned transfers to and from reserves, of £5.1m, which represented a 1.5% variance against budget.

This final position represented an improvement on the position previously reported to Cabinet, mainly due to late, unexpected grant funding, additional income and a slight reduction in demand in certain areas.

The Leader explained that the 2022/23 the underspend of £5.1m, was due to the following:

- (i) Underspends against non-service budgets, specifically the general and covid contingency budget. The contingency budgets were temporarily increased for 2022/23 following Covid, these were not required to balance the budget this year.
- (ii) Overachievement of interest receivable due to interest rates rising, higher than anticipated investment balances and increased savings on interest payable due to the delayed need to undertake borrowing, caused by slippage in the capital programme. Additionally, there was underspend on the Council Tax reduction scheme.
- (iii) These underspends were, however, offset by overspending in service areas due to increased demand and rising costs resulting from the high inflationary environment.

Emergency placements within Children's Services and demand for temporary accommodation within Housing and Communities were the two most significant areas of additional demand. The higher than anticipated pay award for NJC staff across the council also significantly contributed to this position.

Detailed explanations of the over and underspending against budgets can be found in section 2 of the report.

Whilst the outturn overall was positive for the Council's finances; there were specific issues which had the potential to impact on the forthcoming year. A number of these issues were addressed as part of the 2023/24 budget setting process, although some remain that could impact during the year. These risks were explained in detail within section 4 of the report and continued to be monitored by the Executive Team.

As school variances were managed via individual school's balances, the overall underspend of £5.1m did not include the schools' position. For 2022/23, schools collectively overspent by £1.3m which saw school balances reduce from £15.7m to £14.4m as at 31 March 2023.

In light of the significant level of savings that schools needed to make during the 2023/24 financial year, officers continued to closely monitor school balances over the medium term as part of the Council's deficit avoidance and prevention strategy.

As part of this meeting, Cabinet, were being asked to approve the use of this underspend.

Before moving onto the considerations, the Leader invited colleagues to give their general comments on the report.

Comments of Cabinet Members:

- Councillor Davies thanked schools for their hard work setting the balance budget during these incredibly challenging times. School staff also work very closely with officers in finance to ensure that those budgets were set and were determined this year to spend wisely and carefully going forward.
- Councillor Batrouni added that whilst the underspend was welcome the Council still faced challenges going forward. Interest rates, pressures on council services and households meant more pressure on the Council going down the line. There were already overspend pressures in housing, social care, social services and out of care placement and this was not going to abate. There was also a forecast across Wales of a shortfall between £300 and £400 million and we should therefore be mindful of a bleak picture.

Having this one-off funding available was extremely helpful both in the current year, and future years, to support the Council in delivering its corporate priorities but Cabinet, as mentioned by the Cabinet Member for Organisational Transformation suggested, we should be mindful that there were still challenges.

Section 5 of the report detailed how the £5.1m was proposed to be used:

- £947k to support service delivery, including the provision of transport for pupils of St Andrews and Millbrook primary schools and empty homes enforcement interventions, financial assistance, and debt recovery,
- £1.9m to manage operational risks in the context of reduced contingencies and pressure on budget, and

- The residual balance of £2.17m be allocated to the capital reserve to boost the overall level of capital headroom and, in doing so, provide additional capacity to be able to support several one-off projects in relation to the capital programme.
- Clarify the projects in due course, Cabinet was committed to ensuring that at least half of this was prioritised for highways department to address the most problematic areas of potholes and other issues.

Given the current external environment, the Leader was also seeking Cabinet's approval to move a proportion of that money to third sector partners in order to help alleviate holiday hunger for the next six weeks across Newport, the final figure was yet to be determined.

The total reserves balance on 31 March 2023, following the transfers set out within the report, would reduce to £138.9m from the balance of £151.9m a year ago. The significant movements were summarised within section 5 of the report.

Comments of Cabinet Members:

- Councillor Harvey mentioned that holiday hunger was a real thing and 95% of families were in work poverty, which was going to get worse, therefore the Cabinet Member for Community and Wellbeing fully endorsed the funding.
- Councillor Davies also fully supported the proposed. Families in Newport were used to receiving school holiday vouchers, children had become reliant on Free School Meals (FSM) and families budgeted accordingly for it. As Welsh Government were no longer able to provide these vouchers, there was a desperate concern to all. It was a priority and therefore excellent news that the Council would support these families.

Decision:

That Cabinet

1. Noted the outturn position, which was subject to audit; and the major variances for the year (sections 1-3);
2. Approved use of the underspend and other reserve transfers as set out in section 5 of the report, noting the resulting level of the Council's general and earmarked reserves;
3. Noted the school's outturn and the position on the individual and total school reserves (section 3).

5 2022/23 Capital Outturn and Additions

The next report presented by the Leader was the Capital Programme Outturn report for 2022/23. This was the final report of the year on capital activity which provided an overview of the final amount of capital expenditure incurred in the year, compared with the allocated budget. As part of this, the report outlined the level of slippage and underspend incurred and provided an update on the level of available capital headroom.

In addition to this, the report outlined the additions to the programme that were identified and requested authorisation as Cabinet, for their inclusion.

- o The first section outlined the movement in the capital budget since the last report was presented to Cabinet, in February.
- o The total value of additions and amendments was £51m, however more than half of that was formally approved as part of agreeing the Capital Strategy for 2023/24. Therefore, the value of additions that required approval, the majority of which were externally grant funded, stood at £18.5m. These additions took the total budget for the year to £91.8m.

- o A further breakdown of these additions was given in Appendix A.

Against the revised budget, total expenditure of £61.2m was incurred, resulting in a variance of £30.6m.

This variance comprised a net underspend of £47,000 and more significantly, slippage totalling £30.553m. It was necessary for this slippage to be carried forward into future years in order for ongoing and previously approved schemes to be completed.

The overall value of slippage increased by £3m since the last report. Relatively speaking, this was a small increase compared to that seen in previous years. This was mainly due to the fact that a number of large schemes were now underway but also because of reprofiling undertaken in previous months.

It was noted, however, that the overall level of slippage was still significant and was something that needed to be managed robustly in future years.

In addition, a further review of the 2023/24 capital budget was required, to ensure that it reflected a realistic profile. Currently, the budget stood at nearly £95m and would be a challenge to deliver. It was, therefore, necessary to reprofile this across the remainder of the programme to increase the chances of delivering against the budget and minimising the level of slippage reported in future years.

The report also detailed the level of capital headroom currently available, which could be used to support new schemes.

This now stood at £9.774m, after allowing for two pre-commitments against this funding.

The majority of the balance was held within the capital expenditure reserve, following Cabinet's decision in February to transfer the full value of the residual 2021/22 revenue underspend (£7.9m) to that reserve.

Whilst the headroom recently had a significant boost, there remained a need to tightly control its use, so that it was available for only the most critical issues, as and when they emerged.

In addition, any opportunity to further increase in the headroom would need to be taken, so that it was possible to support as many priorities as possible and also ensure that sufficient funding existed to respond to any cost increases in relation to existing schemes, driven by rising construction industry costs.

Comments of Cabinet Members:

- Councillor Batrouni welcomed the headroom element in the report. Interest rates were high, and with this in mind, it was prudent to increase the headroom to give the Council space and flexibility going forward, therefore report was welcomed.
- Councillor Davies agreed with comments of her colleague regarding the capital headroom as well as showing prudence for projects going forward.

Decision:

That Cabinet

1. Approved the additions to the Capital Programme requested in the report (Appendix A).
2. Noted the capital expenditure outturn position for 2022/23.
3. Approved slippage of £30,553k from the 2022/23 budget into future years.

4. Noted the available remaining capital resources ('headroom') and the earmarked usage of that resourcing.

6 Welsh Language Annual Report

The Leader was pleased to present the annual report which detailed the Council's progress in complying with the Welsh Language Standards as part of the Welsh Language (Wales) Measure 2011.

The report provided an overview of the Council's progress in meeting the Standards, included information required to be published on an annual basis, a summary of key achievements during the year, and priority areas for future work.

Whilst this was a Newport City Council report, engagement, development, and co-production was at the heart of all activities and events. Da iawn pawb.

Members noted the key highlights from the year, including:

- o The significant increase in delivery of Welsh Language Awareness sessions for the council's workforce with 99 members of staff being trained.
- o The adoption of the Welsh in Education Strategic Plan (WESP) 2022-2032 Council and approval by Welsh Government.
- o The launch of the Council's Welsh Language Skills Policy demonstrating the Council's commitment to the Welsh language through recruitment and training.

The report also identified the key priorities for 2023-24, including:

- o Building on the creative partnership arrangements developed outside the public and voluntary sector to better raise the profile of the Welsh language across Newport with opportunities at Dragons rugby and Newport County AFC.
- o Delivering a cohesive approach to Welsh language skills development across our OneNewport partners through the Right Skills Board.
- o An even greater focus on recruitment, retention, and development of Welsh speakers across all services areas within the council, and
- o Facilitating and supporting events throughout the year and looking at the cross-cutting themes around equality, diversity, and inclusion.

The Leader invited the Cabinet Member for Organisational Transformation and lead for Equalities and Welsh Language to comment. If happy with this, officers will update the Cabinet Member with the below words.

Councillor Batrouni thanked the Leader and remarked that as the Cabinet Member lead for Welsh language, I welcome this Annual Welsh Language Monitoring Report which reflected on our achievements, performance, and compliance with our statutory duties.

This year has again demonstrated the council's commitment to the Welsh language whilst we have readjusted to the relaxation of restrictions of the global pandemic and the ongoing financial budgetary demands to make unequivocal progress against our commitments towards the Welsh language in the city. The Cabinet Member for Organisational Transformation added that the Council could not do this alone and needed the support of the community and the Welsh speakers within the city with community groups coming together,

which they could not during the pandemic. Councillor Batrouni remarked that going forward, along with the partnership worked it was hoped to see this progress accelerated.

The Leader thanked Councillor Batrouni and also took the opportunity to thank Councillor John Harris for supporting the work in his role as Welsh Language Champion. Diolch yn fawr iawn’.

Comments of Cabinet Members:

- Councillor Hughes addressed his Cabinet Colleagues in Welsh and English.

Mwy na ugain blynedd yn ol pan gyrhaeddais I yn Gasnewydd, roedd bron lawn popeth iw ymnweud ar iaith gymraeg yn frwydyr I fynyr allt.

Erbyn hyn yr ydym yn gweld yn awr ymwybyddiaeth or Ddinas yn tyfy— a chyngor rhagweithiol yn gystylltu ar gymuned

Maen gywir y bydd ein focws y flwyddyn nesaf ar bartneriaethau a datblygu staff ein hunain.

Maer gwaith hwnnw-a gwaith ein ffrindiau yn y ddinas yn gwneud gwahaniaeth mawr.

Ysgolion gymraeg, bandiau cymraeg, gwyliau gymraeg fel Mari Llwyd a gwaith gwych y menter a capel Seion ac eraill yn ganol y ddinas.

Diolch ir aelod cabinet ai swyddogion am ei gwaith I paratoi yr adroddiad a thrwy gydol y flwyddyn am ei gwaith I helpu sicyrhau dyfodol llwyddianus ir iaith gymraeg yn ein cyngor.

More than Twenty years ago leader when I first arrived in Newport almost everything in relation to the Welsh language was an uphill struggle.

What we are seeing now is a city whose awareness is on the rise supported by a council that is proactively engaging with the community. It’s right that our focus in the coming year will be on partnerships and developing our own staff in all our service areas.

The work we do as a council and with our friends and partners has an impact on the city. We have seen Newport’s commitment to Welsh education, we see our pubs putting on welsh bands and festivals like Mari Llwyd bringing the old traditions and songs to the streets of our city. I’m proud as a Welsh speaker to be part of a council that is embracing the positives of our beautiful language.

I thank our cabinet members for organisational transformation, leader and our officers for their efforts in producing this report and throughout the year in supporting the language grow in our city.

- The Leader thanked Councillor Hughes and was delighted to hear him deliver his response in Welsh.
- Councillor Davies mentioned that last year the Welsh Strategic Plan had been adopted. The Cabinet Member for Education and Early Years had recently met with the Welsh Minister for Education and what was recognised by Welsh Government was our strength and strategic focus within the report; specifically in support of developing opportunities for teaching Welsh throughout Newport. This would be developed over the next 10 years and was a strong plan to be proud of. It was noted that key priorities within Newport schools ensured that all families were made aware of Welsh medium education options as well as understanding the importance of a bilingual education. The Cabinet Member had seen first-hand parents being invited to school and participating in the learning opportunities, such as support with homework and learning themselves to speak Welsh.

It was excellent to see this year's Welsh Annual Report and Councillor Davies looked forward to next year's report, which would be better.

- Councillor Marshall added that it was an interesting report and there was also other means and opportunities to promote the Welsh language. Councillor Marshall recently attended an event for Hungarian Children in Maindee where there was a mix of languages including Welsh. There was an increase in the use of the Welsh language by young people in the city. Moving forward with the one million Welsh Speakers plan, it was about those that spoke Welsh in a formal capacity also being able to speak Welsh socially. As elected members, we should look at effects in our own wards and abilities and opportunities moving forward.
- Councillor Forsey agreed that it was a very interesting report and that there were different promotional activities to support the Welsh language such as singing, cooking and family activities. An important aspect of promoting the Welsh language was promoting the Welsh culture. There were a number of links to videos in the report and these should be watched. Additionally, there were a very low number of complaints about the Welsh language; only three for Newport City Council and two to the Welsh Commissioner and it was good to see actions being taken and resolved. The Council was also working with partners to promote Welsh, such as Newport Live, who provided flash cards in Welsh for their staff.

Decision:

That Cabinet approved the attached final monitoring report and published it on the Council's website, in accordance with statutory deadlines.

7 Corporate Risk Register Update (Q4)

The Leader provided an update of the Council's Corporate Risk Register for the end of Quarter 4 (1 January 2023 to 31 March 2023).

Cabinet Members were asked to consider the contents of this report and the monitoring of these risks in the Corporate Risk Register.

The Council's Risk Management Policy and Corporate Risk Register enabled this administration and officers to effectively identify, manage and monitor those risks which could prevent the Council from achieving strategic priorities and undertake statutory duties as a local authority.

The Quarter 4 risk report would also be presented to the Council's Governance and Audit Committee later this month to review the Council's risk management process and governance arrangements.

At the end of Quarter 4 Newport City Council had 45 risks recorded across the Council's eleven service areas.

Those risks deemed to pose the most significant risk in the delivery of the Council's Corporate Plan and services were escalated to the Council's Corporate Risk Register for monitoring.

At the end of Quarter 3, 14 risks were recorded in the Corporate Risk Register.

- 8 Severe Risks (15 to 25).
- 6 Major Risks (7 to 14).

In comparison to Quarter 3, there was one risk, *Eliminate Profit from Social Care* which was escalated from Children Services:

- o The Council was commencing a significant programme of work to support the Welsh Government's policy to eliminate profit from Children's social care.
- o In response, the Council saw providers withdrawing from the market which meant the Council was having to make placements with practices 'operating without registration' which was a criminal offence under the Social Services Act.
- o The Council was fully aware of the risk being raised here and agreed this was a corporate risk. The Council was working very hard with providers, Care Inspectorate Wales and other partners to ensure children were being looked after with the best providers for their needs.

One risk, *Ash DieBack* disease was also de-escalated from the Corporate Risk Register to the Environment and Public Protection risk register at the end of Quarter 4.

- o Following the identification and assessment of Ash DieBack disease across Newport, the Council took immediate action to remove trees with Ash DieBack from high-risk areas.
- o Funding allocated by the Council was also used to replace the trees removed, ensuring its ecological commitment was met to protect and enhance Newport's environment.
- o The service area would continue to monitor and report against this risk and the work to remove infected trees and its replacement programme.

The Risk Report also showed two risks in relation to the stability of social services providers and pressure on adult services improving since Quarter 3.

- o Both risk scores decreased from 25 to 20 at the end of Quarter 4.
- o The Stability of Social Services providers with adult services saw improvements to the flow of brokered packages of care.
- o Provider services however remained in a very precarious position and the Council continued to monitor the situation closely in 2023/24.
- o The pressure on adult services also improved following the recruitment to key posts within the service. It was important that support for social workers and supporting officers within social services continued as they provided a pivotal role to safeguard the most vulnerable residents and carers in Newport.

The remaining 12 risks were reported with the same risk score as quarter three.

To conclude, Cabinet colleagues, were asked to agree the contents of the Corporate Risk Register (Quarter 4), to continue monitoring of these risks and the actions being taken to address the risks identified in the report.

Comments of Cabinet Members:

- Councillor Marshall highlighted the difficulties experienced within Childrens Services, which was a challenging environment. Managers provided the best possible care for children and with that in mind, the Cabinet Member for Social Services (Children) wanted to thank staff for everything they did to support children.
- Councillor Davies referred to the school finances in the amber position and was aware of the risk increase in relation to budgets and that it was a key responsibility for everyone involved to support schools with their financial decisions. The demand for ALN and SEN

support remained a focus as these needs were increasing. These issues were being addressed and an example of this was seen in the recent expansion at Ysgol Bryn Derw, which was specifically set up for children with ASD. There was also a new ALN provision to be opened soon school at Llanwern School in the Autumn. Hopefully, we could continue to address these issues by addressing these risks. Out of school placements always remained a concern and unfortunately the Council did not have the ability to support those with extreme needs. Overall, these risks would be constantly monitored.

- Councillor Harvey echoed Councillor Marshall's comments in relation to staff working very hard. With regard to the out of county placements, this was out of the Council's control as a judge in a courtroom would have to make this decision.
- Councillor Hughes also highlighted that the decisions and pressures that teams were under was mainly due to external pressures.

Decision:

That Cabinet considered the contents of the quarter four update of the Corporate Risk Register.

8 NCC External Pressures - Cost of Living

The final report on the agenda presented by the Leader was the monthly report providing members with an update on the main external pressures facing the council, our businesses, residents, and communities.

The cost-of-living crisis remained one of the main areas of concern for our residents, businesses, and services. For the second month, the UK's inflation rate in May was 8.7% with prices for food and non-alcoholic drinks rising between April and May.

Within the report there was a link to a Citizens Advice survey finding as many as one million people had their broadband cut off in the last year as the cost-of-living crisis left them unable to afford internet access. The impact as a result of this was quite significant in terms of accessing the support that families needed.

The Leader of the Council and Chair of OneNewport, continued to advocate for partnership working as being vital in supporting residents and businesses and the Leader urged residents experiencing difficulties, to contact the council for information and signposting on the advice and support available, either in person, by phone or by visiting the support and advice pages on the website.

The report provided information on how officers from across the council and its partnership agencies continued to work together to coordinate and provide residents with support, advice, and guidance.

Cost of Living events were taking place across the city to provide opportunities for residents to access free help, support, and advice on managing debt and maximising income.

From September 2023, Newport schools would have implemented the Welsh Government's Universal Primary Free School Meals across Key Stage 2, meaning that all primary aged pupils would be able to benefit from this initiative.

As part of the Council's commitment to the Ukrainian communities, with the planned closure of the super sponsor scheme, officers were focused on developing housing initiatives. Cabinet colleagues were encouraged to promote the opportunity for residents across Newport to come forward as 'hosts'.

Comments of Cabinet Members:

- Councillor Harvey agreed that the cost-of-living crisis was horrendous, and that people were maxing out their credit cards instead of avoiding asking for help and this was not the way forward. Councillor Harvey encouraged people to touch base with their local councillor as well as highlighting the community events put on by the Council to help families. Families could also ask for a food parcels for the extra support. In addition, families were also using pay day loans. Councillor Harvey urged residents not fall into the trap of extra debt but to contact the council who would provide help and advice.
- Councillor Marshall mentioned that it was positive to see a number of events taking place within Newport from carers support from social services to an event at Tesco, Cardiff Road. This was a reinforcement that help was in place, there was also a community connectors café at the Riverfront, where carers could receive help and advice, and this went a long way to help people become independent.
- Councillor Davies focussed on Newport education's priority of tackling all aspects of poverty. There was universal school provision, which was being rolled out to all schools at the start of Autumn Term. The Council was ahead of Welsh Government's expectations and Councillor Davies wanted to thank officers who worked incredibly hard to ensure that this would happen. The uptake of children wanting Free School Meals at foundation phase had dramatically increased. The Council was also supporting those children in poverty in schools by developing a strategy of tackling poverty, which was progressing with enthusiasm and would continue to develop over the next three years as part of the service plan. Teachers had welcomed this level of commitment and support and was also receiving support from Children in Wales, as well schools looking into reducing the cost of resources. A partnership was recently developed with the Bank of England, bringing financial awareness into the curriculum, as well as working with other financial partners in the future. A newsletter for all Head Teachers and Governors was also being distributed to raise awareness of the key priorities in relation to tackling poverty.
- Councillor Batrouni added that it was wonderful to hear all the amazing efforts of Cabinet colleagues and Council and hoped that the pressures faced by the Council and residents would be addressed as a matter of priority.

Decision:

That Cabinet considered the contents of the report on the Council's activity to respond to the external factors on Newport's communities, businesses, and council services.

9 **Work Programme**

This was the regular monthly report on the work programme.

Decision:

Cabinet agreed the Work Programme.

Report

Cabinet

Part 1

Date: 13 September 2023

Subject **July Revenue Budget Monitor**

Purpose To highlight the current forecast position on the Council's revenue budget and the financial risks and opportunities that present themselves within the July position. This is the first Cabinet update of the 2023/24 financial year.

Author Head of Finance

Ward All

Summary The July 2023 revenue monitoring position reflects a forecasted underspend of £3.044m, taking into account the contingency budget. Whilst an overall underspend is projected, it should be noted that service areas are collectively forecast to overspend by £3.679m, excluding schools. This significant service area overspending is offset by underspends in non-service areas, such as Capital Financing.

The most significant element of service area overspending is within Children's Services (£3.532m), where significant demand levels for, and individual cost of, out of area and emergency placements is the underlying factor behind this position. As well as this, Housing & Communities and People, Policy & Transformation are also projecting large overspends, the details of which are outlined further in the report. Partly offsetting these service area overspends is a significant underspend within Adult Services (£1.035m).

Schools are separately projected expenditure in excess of budget totalling £5.829m. This expenditure comprises both planned, one-off, use of reserves, as well as an element of recurring expenditure, which, for this year, will be offset by available surplus balances. Going forward, there is a risk that this level of recurring expenditure in excess of budget will result in certain individual schools entering a deficit budget position. Therefore, close monitoring will be required during the remainder of this year to ensure that schools are managing their finances as required and taking action to ensure that deficit positions are avoided wherever possible.

Whilst an overall underspend is currently being projected, it is important to note that there are a number of risks that could result in the position deteriorating over the course of the year. For example, the 2023/24 NJC pay award is not yet confirmed and, whilst the current offer is broadly in line with the budget provision made for this year, any increase in the final offer would place an in-year and future year pressure upon the Council's finances. As well as this risk, some of the demand issues that are causing the service area overspending could increase during the year and place further pressure on services such as Children's Services and Housing & Communities. In addition, the recent announcement by the First Minister, regarding the challenges Welsh Government is facing with its in-year finances, presents a risk that certain, budgeted, grant funding could be withdrawn, leaving the Council to absorb the impact of unfunded costs within its own budget.

The appendices to the report are as follows:

Appendix 1	Overall budget dashboard – July 2023
Appendix 2	Revenue summary monitor - July 2023
Appendix 3	School balance outturn position
Appendix 4	2023/24 reserve movements

Proposal That Cabinet:

- Note the overall budget forecast position outlined within this report, which is comprised of service area overspending, offset by underspends against non-service budgets.
- Note the risks identified throughout the report and in the HoF comments, such as in relation to demand issues being faced and the unconfirmed NJC pay award for 2023/24.
- Note the overall shortfall in the delivery of savings accepted as part of the 2023/24 revenue budget.
- Note the forecast movements in reserves.
- Note the overall position in relation to schools, acknowledging the risk that some individual deficit positions could emerge by the end of the financial year.

Action by Cabinet Members / Head of Finance / Executive Board:

- HoS implement actions to ensure that agreed 2023/24 and previous year budget savings are achieved as soon as practically possible, but by the end of the financial year at the latest.
- Cabinet Members and HoS promote and ensure robust forecasting throughout all service areas.

Timetable Immediate

This report was prepared after consultation with:

- Leader of the Council
- Chief Executive
- Strategic Directors
- Head of Finance
- Head of Law and Standards
- Head of People, Policy and Transformation

Signed

1 Background

- 1.1 The 2023/24 revenue budget was set against an incredibly challenging financial backdrop, driven by the high levels of inflation, resulting in rapidly increasing prices, as well as increasing demand for services such as homelessness and emergency children's placements, in the wake of the COVID-19 pandemic. Because of this, the Council faced a significant budget gap when setting its budget for this financial year, requiring a range of mitigating actions to be taken in order to ensure that a balanced budget was achieved. Part of these mitigating actions included savings totalling circa £20m, representing a stepped change from the level of savings required over the last two years. Therefore, coming into the 2023/24 financial year, there was already a potential risk that it would be difficult to achieve all agreed savings in full by the end of March 2024.
- 1.2 As well as the level of savings that needed to be achieved, the demand for services such as out of area and emergency placements within Children's Services, and temporary accommodation for homeless people within Housing & Communities, was also a pressing issue heading into 2023/24. This was recognised as part of the budget that was set, however, as the year began, it was clear that financial pressures in these areas, over and above the increased budget allocation, could be part of the 2023/24 in-year position and would need to be managed within services' budgets or, failing that, as part of the overall position.
- 1.3 Furthermore, there remained the possibility that inflationary pressures would continue to impact the Council's ongoing finances, despite the significant budgetary increases that were agreed for 2023/24. For example, provision for pay awards much higher than those generally seen in recent years was made, although the final pay awards were not agreed by the start of the year. Therefore, for both NJC and teaching staff, there was a risk that the final awards could exceed the budgetary provision made. For teachers, the September 2023 award is now known, and it is understood that grant funding should be forthcoming from Welsh Government to offset the cost over and above that budgeted for. However, with NJC, the pay award has not been finalised, although a provisional offer is known. This provisional offer is broadly in line with the provision made in the budget but, should the final offer be higher than this, it will place additional in-year pressure upon both schools and non-schools budgets.
- 1.4 In order to mitigate some of these risks, the Council has an unallocated contingency of £1.373m which can be used to offset unforeseen costs. However, in the context of a net budget totalling £373m, this provides relatively little mitigation, particularly if multiple issues present themselves in the year. Some earmarked reserves are held to provide mitigation for such issues, although, again, these are not significant and may be insufficient in addressing all issues that could emerge. Fortunately, it is known that there will be a large underspend against the capital financing budget in 2023/24, due to the fact that the capital programme was forward funded in 2021/22 and slippage in delivering the programme has resulted in this budget not being fully spent to date. However, this is very much temporary mitigation and cannot be relied upon in future years, as the full delivery of the capital programme will result in this budget being fully utilised.
- 1.5 The first monitoring position of the year, as at July 2023, provides confirmation that some of those known risks, at the start of the year, have materialised and are causing significant overspends, especially within Children's Services. As anticipated, it is currently proving possible to offset these service area overspends with the general contingency and underspends within capital financing. This leaves a projected underspend of £3.044m, at this point of the year.

A summary of the key areas contributing to the overall position, excluding schools, is below:

Children's Services overspend (primarily emergency & other placements)	£3,532k
Housing & Communities overspend (primarily homelessness provision)	£572k
Other Service Area Variances (net)	(£473k)
Non-Service - Council Tax, CTRS and other Non-Service budgets	(£1,440k)

SUB-TOTAL – OVERSPEND BEFORE CONTINGENCIES	£2,191k
Core budget - general revenue budget contingency	(£1,373k)
Capital Financing underspend	(£3,862k)
TOTAL	(£3,044k)

2 Key Areas Contributing to Position

2.1 The following section details some of the key areas that feature within the position, with Appendices 1 and 2 providing further detail. As any under or overspend within schools is offset via a transfer to or from school reserves, the collective impact of this is neutralised within the overall position, and does not affect the bottom line:

- (i) Risk-based area variances
- (ii) Other service budget variances
- (iii) Non-service variances
- (iv) Delivery of budget savings

(i) Risk based area variances

2.2 The Council takes a risk-based approach to budget monitoring, with additional focus being given to those areas that tend to exhibit volatility or have a history of significantly overspending. Those risk-based areas, which often reside within demand-led services, are collectively forecasting a net overspend of £2.723m. Significant overspends within that net figure are outlined below:

- Children’s Services out of area placements (+£4.075m). The budget available, which is supplemented by external grant funding, allows for an average of 15 placements per month. At the end of June 2023, there were 23 placements, and it is anticipated that this will remain the monthly figure for the remainder of the financial year. In addition to numbers exceeding the available budget, in some cases the cost of a placement has significantly increased when compared with previous years, which has added to the overspend. In addition to out of area placements, there is also an overspend of £412k in relation to emergency placements being projected.
- Adult Services residential and non-residential service (+£2.008m). The non-residential care budget can accommodate 936 service users at an average cost. Currently, the forecast reflects service users totalling 947 and, of that figure, the care packages of circa 30% of service users exceed the average weekly cost that the budget allows for. In relation to residential care, there are currently 583 residential placements compared to the 555 that the budget can afford. Approximately 13% of care packages exceed the average weekly cost, which has added to the level of overspend.
- Education ALN local provision development (+£645k). Additional costs are being incurred following the procurement of capacity within Newport in order to avoid the higher cost of out of area placements. As well as this, several pupils are currently being supported to remain in mainstream settings, which assists with avoiding the more expensive out of area placements but has added cost against this budget.

2.3 Partly offsetting the overspends outlined above, and detailed in Appendix 1, are a number of risk-based areas that are identifying underspends, which are set out in the following paragraph.

- Adult Services community care – supported living (-£851k). The budget can accommodate 170 service users at an average weekly cost. The current number of service users is 172, however more than half of those packages are costing less than the budgeted weekly cost, resulting in a significant underspend.
- Adult Services community care income (-£2.577m). This underspend relates to service users (both residential and non-residential) contributing towards the cost of their care. As service user numbers are currently higher than anticipated, there is a greater level of income being generated than was budgeted for. In the case of residential care, service users are assessed

as to their ability to pay (with no weekly cap in place) meaning that the level of income generated can fluctuate year to year.

(ii) Other service area budget variances

- 2.4 As well as those areas that have been assessed as requiring a risk-based approach to monitoring, there are other variances that emerge and contribute towards the overall position forecasted.
- 2.5 The main variance identified in the July position relates to the homelessness service within Housing & Communities. This is an area that has seen a significant increase in costs over the last two years, following the Welsh Government's policy aim to dramatically reduce homelessness. Despite the Council allocating a significant budget increase for 2023/24, to address the ongoing impact of the overspend incurred in 2022/23, costs have increased further and an overspend of £711k is being projected. This overspend mainly relates to staffing costs, which had originally been planned to be funded from a grant, and additional costs in relation to Housing Benefit, which exceed the level of subsidy awarded by the Department for Work & Pensions.
- 2.6 Material variances in other service areas include an overspend of £417k within the Environment & Leisure part of the Environment & Public Protection service, which is predominantly the result of the need to incur additional costs in relation to tree inspections. In addition to this, within the People, Policy & Transformation service, there are overspends exceeding £700k in relation to assets and property. Some of these overspends are the result of additional maintenance costs being incurred and others being the consequence of loss of income. Across all directorates, there are a number of vacancies being experienced and recruitment challenges are resulting in vacancies being held for longer, which, unless covered by agency staff, are generating underspends.

(iii) Non-service variances

- 2.7 There are a number of budgets within non-service areas that are projecting underspends and, ultimately, more than offsetting the net service area overspends, resulting in an overall underspend for the whole council. The main variances are listed below:
- | | |
|---------------------------------------|-----------|
| • General unallocated contingency | (£1,373k) |
| • Capital financing | (£3,862k) |
| • Council Tax Reduction Scheme (CTRS) | (£422k) |
- 2.8 The most significant of these variances is the capital financing underspend, which is the product of underspends against the budgets for Minimum Revenue Provision (MRP) and external interest payable, as well as a projected surplus in relation to interest receivable. The underspends on MRP and interest payable were expected, due to having forward funded the budgets necessary to meet the cost of the total capital programme. Slippage in delivering the programme has resulted in the full utilisation of this budget being delayed, which has led to a temporary underspend in this financial year, as well as potentially, although to a lesser extent, in the next year. Regarding the additional interest receivable being generated, this is the result of rising interest rates, meaning the return on investments made is greater than the budget assumes, coupled with higher than expected investment balances, resulting from the aforementioned slippage and the consequent deferral in new external borrowing this has led to.
- 2.9 The projected underspend in relation to CTRS follows a significant budget reduction as part of setting the 2023/24 budget. Despite this reduction, numbers are remaining relatively stable, meaning that the headroom that was retained within the budget for growth in numbers has not been required, to date.

(iv) Delivery of budget savings

- 2.10 As outlined in the background section to this report, the 2023/24 budget setting process was set against a particularly challenging financial backdrop, culminating in the need for savings totalling £19.385m being required in order to balance the budget. The table below outlines the progress

made to date in delivering those savings and highlights the fact that £1.435m is not expected to have been achieved by the end of the year. In addition, there remains £237k of unachieved savings from previous years. These shortfalls are part of the overall position being reported and, if not addressed, will be carried forward as a pressure into future years.

Summary by Portfolio	Social Services	Environment & Sustainability	Transformation & Corporate	Regeneration & Economic Development	Education	Non Service	Total
2023/24 MTRP Target (£) Total	2,686	1,619	1,910	953	9,642	2,575	19,385
Total Savings Realised by Year End 2023/24	1,771	1,282	1,795	953	9,574	2,575	17,950
Variation to MTRP Target	-915	-337	-115	0	-68	0	-1,435
Variation % to MTRP Target	-34%	-21%	-6%	0%	-1%	0%	-7%
Undelivered Savings from Previous Years	-62	-85	-90	0	0	0	-237
Total Undelivered Savings	-977	-422	-205	0	-68	0	-1,671

- 2.11 In terms of the specific undelivered savings to date, the two services responsible for the majority of the shortfall are Adult Services and Housing & Communities. Within Housing & Communities, the main shortfall relates to a £296k proposal to reduce the expenditure on temporary accommodation via a range of methods, including increasing move-on opportunities and the level of support given to those individuals in this type of accommodation. To date, it has not been possible to evidence achievement of this saving, especially given the overall overspend in this area. Within Adult Services, savings shortfalls total £915k, relating to four separate proposals, including proposals to reduce staffing and the cost of external contracts. In a number of cases, only partial achievement is being forecast, partly due to a lack of available resources to actually undertake the work to realise the savings, however it is anticipated that these will be fully achieved in readiness for the next financial year.

3 Schools

- 3.1 The table below and Appendix 3 provide an overview of the position regarding individual school balances. As can be seen, the total balances brought forward into 2023/24 reflected a combined surplus position of £14.4m. Within this total, one school had a deficit balance. This overall closing position was better than had been anticipated during the 2022/23 financial year, partly as a result of schools putting on hold areas of one-off expenditure in anticipation of a challenging 2023/24 budget setting process.
- 3.2 For 2023/24, all schools have been able to set a balanced budget, although, in the majority of cases, this has only been achieved via the planned use of existing surplus balances in order to fund either recurring or one-off expenditure, some of which has been deferred from the previous year. The latest monitoring position suggests that all schools, with the exception of one, are forecasting being able to avoid a deficit position by the end of the year. In the case of that one school, the level of projected deficit is small, and it is hoped that it will prove possible to return this position to a balanced one by March 2024.
- 3.3 Overall, school balances are forecast to reduce to £8.6m by the end of the financial year, which is a significant reduction on the balances carried forward. Of this £5.8m reduction, a proportion is due to one-off use of balances that were, in effect, temporarily inflated due to the late receipt of Welsh Government grant funding in previous years. However, of more concern is the fact that around half of this use of balances is to fund recurring expenditure. For some schools, this is an unsustainable position, as surplus balances are limited, and, therefore, there is a risk of entering a deficit position in future years. Because of this, robust monitoring will be required for the remainder of the year to ensure that schools plan for this risk and take the necessary steps to avoid this or minimum the impact.

	Reserves balance 31/03/23	In year Under/(overspend)	Reserves Balance 31/03/24
	£	£	£
Nursery	123,199	(44,765)	78,434
Primary	8,082,726	(3,058,887)	5,023,839
Secondary	5,692,010	(3,484,050)	2,207,960
Special	528,441	(340,893)	187,548
Total	14,426,375	(6,928,594)	7,497,781
Assumed grant and other compensation		1,100,000	1,100,000
		-	-
Total	14,426,375	(5,828,594)	8,597,781

4 Use of reserves

- 4.1 Appendix 4 illustrates the planned movements in reserves throughout the year. Cabinet should note that further work and refinement is required in this area of the budget monitoring and will be updated with the next budget monitor report. At this point, the appendix shows the opening balance as at 31st March 2023 of £138.9m and the forecasted use during the year, which currently totals £11.6m, reducing balances to £127.3m. It should be noted that this includes the projected movement of school balances, which accounts for £5.8m of that movement. The other movements are planned or budgeted and in line with the purpose of the earmarked reserve. Also contained with the total position is the General Fund Balance, which totals £6.5m, as it has for a number of years. This reserve would only be accessed in the event of last resort and where all other options had been considered. The general level of cover provided by this balance is low, standing at 2.7% of the net budget, excluding schools. This reinforces the fact that this should only be accessed where absolutely necessary.
- 4.2 On the face of it, the Council currently has a good level of reserves, although these are diminishing, as shown by the reduction of £13m in 2022/23 and projected reduction of £11.6m this year. However, whilst the total level of reserves is good, with the exception of the General Fund Balance, they are all either earmarked or ringfenced for specific purposes, including the financial impacts of risks the Council is facing. Having said that, if absolutely necessary, earmarked reserves could be repurposed to meet an overspend or specific unforeseen costs. In doing so, it may result in a certain policy objective no longer being achievable, or the requirement to repay the reserve in future years. The requirement to repay reserves would place an immediate additional pressure upon the Council's Medium Term Financial Plan and, because of this, the unplanned use of reserves should be avoided wherever possible.

5 Outlook for the remainder of the year

- 5.1 The position outlined in this report represents the first one of the year and is likely to change as the year progresses. In previous years, the general trend has been for the position to improve throughout the year. This can be because of unexpected grant funding allocations from Welsh Government, which can offset core expenditure, or because of changes to forecasts resulting from vacancies, for example. In the case of the 2023/24 year, it is possible that further vacancies could arise, stemming from the recruitment challenges being experienced across all services, which would improve the position further. However, the prospect of additional grant funding is potentially less reliable than it may have been in previous years, following the recent announcement by the First Minister, which confirmed that Welsh Government need to take steps to eradicate its in-year overspend, which could see as yet unconfirmed grants being withdrawn.
- 5.2 In addition to the risk of grant funding not materialising, there are other risks that could negatively impact the position. These include:
- The cost of pay awards exceeding the level of provision contained within the budget, especially in the case of the NJC pay award, which has not yet been finalised.
 - Other inflationary pressures emerging, despite the gradually reducing level of inflation nationwide.

- Demand pressures increasing further and resulting in increasing overspends against demand-led services, such as Housing & Communities and Children's Services.

5.3 Therefore, whilst there is currently an overall underspend being projected, there remains a risk that this position could change and an overspend emerge. This is a situation that needs to be avoided, so that earmarked reserves can be retained for their intended purpose and the opportunity to boost the capital funding headroom can be pursued. Services should, therefore, maintain a focus on financial management and ensure that emerging issues are addressed and managed within existing resources. Where overspends are already being projected, services should be taking steps to reduce these overspends and, ideally, return to a balanced position.

5.4 It is recognised that there is a significant underspend forecast and whilst it is still early to have certainty on this position, especially given the potential risks outlined within the report, it is important that we generate as much of an underspend as possible to boost capital resources. The Head of Finance recommends early consideration for the potential use of this underspend at year end for this purpose. Any transfer to capital resources would add much needed resources to the Council's capital funding headroom and provide scope to respond to unforeseen capital pressures/priorities as and when they arise.

Timetable

Ongoing

Risks

Detailed financial risks are included in the report and appendices where applicable

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?
Risk of overspending, due to increased demand, cost increases or unforeseen costs.	H	H	Regular forecasting and strong financial management. Services to identify ways to absorb pressures within existing budgets. Existence of contingency budgets to provide mitigation.	CMT / SFBPs and budget holders HoF
Poor forecasting	M	M	A revised approach to forecasting, which is intended to create capacity for Finance Business Partners to adequately review the forecasts submitted by budget holders within service areas. Review and refinement in service areas of risk-based modelling. Chief Executive and Cabinet setting out clear expectations of budget manager and HoS responsibilities for robust forecasting and financial management.	Asst. HoF SFBPs and budget managers CX / Leader

* Taking account of proposed mitigation measures

Links to Council Policies and Priorities

Managing the in-year financial position within available resources is a key requirement for the Council and a key component of sound financial management. The medium-term challenges being faced by all councils heightens the need for the Council to avoid an overspend within this financial year.

Options Available and considered

In terms of the overall forecast position and financial management there are no options – the Council needs to operate within its overall budget.

Preferred Option and Why

To note the monitoring position being reported and the risks that could cause this to change during the remainder of the year.

Comments of Chief Financial Officer

The monitoring position outlined in this report reflects an overall underspend of £3.044m. Whilst this reflects a positive position at this stage of the year, this overall underspend is only achievable due to the availability of contingencies and temporary significant underspends in non-service areas. The level of service overspending is a significant concern, though mitigated to an extent by some areas underspending, especially when considering the additional budget that was allocated to alleviate some of these pressures as part of the 2023/24 revenue budget setting process.

The report outlines a number of risks that could result in the position deteriorating as the year progresses. These risks are very real, as evidenced by the level of overspend within Children's Services, in particular, given that at the time of setting the budget it was anticipated that demand pressures could be met from within existing budget allocations and grant funding. Therefore, caution is still required during the year and all services need to ensure that they manage within their available resources and take mitigating action for any unforeseen costs that may emerge.

As well as managing any emerging issues within their existing budgets, service areas also need to ensure that the savings agreed as part of the 2023/24 budget setting process are delivered in full. Currently, a significant shortfall of £1.671m is predicted against savings targets, including unachieved savings carried forward from previous years. These shortfalls form part of the overall position and, whilst they are being mitigated in 2023/24, this may not be possible in future years and, therefore, it is imperative that steps are taken to ensure full delivery of savings by the end of this financial year, so they do not continue to represent a pressure from 2024/25 onwards.

Comments of Monitoring Officer

There are no legal issues arising from this report.

Comments of Head of People, Policy, and Transformation

The report is the first update of the 2023/24 financial year and highlights the current forecast position on the Council's revenue budget and the financial risks and opportunities that present themselves within the July position. An overall underspend of £3.044m is projected, whilst acknowledging the potential risks that could cause this to change during the remainder of the year.

The Well-being of Future Generations Act requires public bodies to apply the five ways if working to any financial planning, which balances short-term priorities with the need to safeguard the ability to meet long-term needs. This is supported through the analysis and review of reserves, which are critical for financial resilience over the long-term and is regularly undertaken by the Head of Finance and detailed in this report.

There are no direct HR implications associated with the report. A Fairness and Equality Impact Assessment was not required but is considered as part of service delivery and will feature in annual finance reports.

Scrutiny Committees

N/A

Fairness and Equality Impact Assessment:

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

For this report, a full Fairness and Equality Impact Assessment has not been undertaken. This is because this report is not seeking any strategic decisions or policy changes, with its purpose being to update Cabinet on the current year financial performance against the budget agreed for the year. However, fairness and equality are considered as part of service delivery and will feature in annual finance reports, such as the Budget Report and Capital Strategy.

In terms of the Wellbeing of Future Generations (Wales) Act, and the five ways of working contained within it, this report highlights examples of these being supported. For example, whilst this report is focussed on the current year, there are references to the longer-term impact, via medium term financial planning, and on taking preventative action, to ensure that financial problems existing now are addressed as quickly as possible, to ensure they do not have a detrimental impact in future years. Analysis and review of reserves, which are critical for financial resilience over the long term, is regularly undertaken by the Head of Finance and detailed in this report.

In the case of the Welsh Language, the service will continue to ensure that, wherever possible, services or information is available in the medium of Welsh.

Consultation

N/A

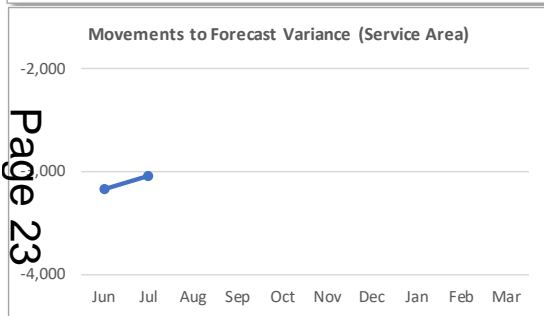
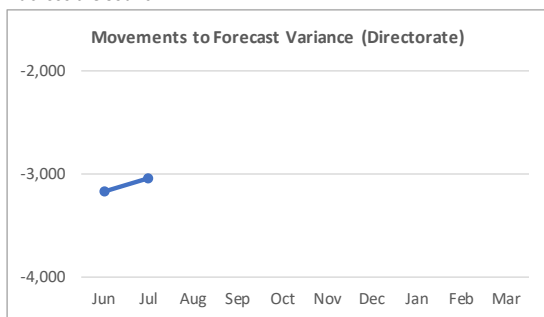
Background Papers

Dated: 5 September 2023

APPENDIX 1 Overall monitoring dashboard – July 2023

Revenue Monitoring Dashboard 2023-24

The following tables, charts and figures give an indication of the financial performance of each Directorate and Service Areas across the Council.



Subjective	Budget £'000	Forecast £'000	Variance £'000
Employees	238,531	247,171	8,640
Premises	32,362	36,668	4,305
Transport	11,242	12,180	938
Supplies & Services	80,144	71,033	-9,111
Agency & Contracted Services	156,700	165,905	9,205
Transfer Payments	37,471	37,274	-197
Support Services	0	0	0
Capital Financing	10,673	8,529	-2,145
Income	-185,806	-197,630	-11,825
Miscellaneous	-7,641	-10,497	-2,855
Grand Total	373,677	370,632	-3,044

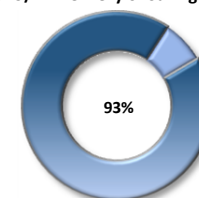
The following tables and charts provide an update on the financial performance for identified risk areas across the Council.

Risk Based Areas	Budget £'000	Forecast £'000	Variance £'000
Adult Services			
Community Care - Non Residential Service	15,870	16,734	864
Community Care - Residential Service	33,650	34,794	1,144
Community Care - Supported Living	14,826	13,975	-851
Community Care Income - Residential & Non Residential	-9,785	-12,362	-2,577
Children Services			
Emergency Placements	332	744	412
In House Fostering	3,856	3,843	-13
In House Residential	2,386	2,411	25
Independent Fostering Agencies	2,517	2,011	-506
Out of Area Residential	2,955	7,030	4,075
Special Guardianship Orders	1,351	1,401	50
Education			
ALN Local Provision Development	877	1,522	645
ALN Out of County Placements	4,235	4,082	-153
ALN Transport	2,592	2,103	-489
Special Home to School Transport	1,275	1,612	338
Infrastructure			
Home to School Transport - College	228	122	-106
Home to School Transport - Primary	1,555	1,435	-120
Home to School Transport - Secondary	1,884	1,869	-15
Grand Total	80,604	83,327	2,723

The figures and charts below report the performance against the 2023/24 savings target.

Service Area	MTRP Target	Savings Realised	Variation to MTRP Target	Variation % to MTRP Target
Adult Services	1,394	479	-915	-66%
Children Services	1,200	1,200	0	0%
Contingency Provisions	1,575	1,575	0	0%
Education	1,387	1,319	-68	-5%
Environment & Public Protection	616	592	-24	-4%
Finance	408	408	0	0%
Housing & Communities	413	100	-313	-76%
Infrastructure	590	590	0	0%
Law & Standards	188	156	-32	-17%
Levies / Other	1,000	1,000	0	0%
People, Policy & Transformation	1,314	1,231	-83	-6%
Prevention & Inclusion	92	92	0	0%
Regeneration & Economic Development	953	953	0	0%
Schools	8,255	8,255	0	0%
Grand Total	19,385	17,950	-1,435	

2023/24 Delivery of Savings (forecast)



% of MTRP Target Achieved

APPENDIX 2 Revenue Summary Monitor - July 2023

	Current Budget	Projection	(Under) / Over
	£'000	£'000	£'000
Summary Revenue Budget 2023/24			
Social Services			
Children Services	29,405	32,937	3,532
Adult Services	69,231	68,196	(1,035)
Prevention & Inclusion	835	774	(60)
	99,471	101,907	2,437
Transformation & Corporate			
Finance	5,598	5,454	(145)
People, Policy & Transformation	15,043	15,463	420
Law & Standards	4,988	5,104	116
	25,630	26,021	391
Environment & Sustainability			
Housing & Communities	8,249	8,821	572
Environment & Public Protection	16,320	16,435	115
Infrastructure	15,269	15,270	1
	39,838	40,526	688
Chief Executive			
Regeneration & Economic Development	6,239	6,342	103
Education	17,638	17,650	12
Schools	129,127	134,956	5,829
	153,004	158,949	5,944
Sub Total - Service Areas (inc schools)			
	317,943	327,402	9,459
Earmarked reserves: Transfer to/(from) Schools		(5,829)	(5,829)
Sub Total - Service Areas (net of school reserves)			
	317,943	321,573	3,630
Capital Financing Costs and Interest			
Capital Financing Costs and Interest (Non-PFI)	16,564	12,702	(3,862)
Public Finance Initiative (PFI)	9,700	9,700	-
	26,264	22,402	(3,862)
Sub Total - Service/Capital Financing			
	344,207	343,975	(232)
Contingency Provisions			
General Contingency	1,373	-	(1,373)
Centralised Insurance Fund	617	617	-
Non Departmental Costs	40	20	(20)
Other Income and Expenditure	3,176	2,213	(963)
	5,205	2,850	(2,356)
Levies / Other			
Discontinued Operations - pensions	1,451	1,386	(65)
Discontinued Operations - Ex Gratia Payments	3	3	-
Levies - Drainage Board, Fire service etc	10,810	10,841	31
CTAX Benefit Rebates	13,739	13,317	(422)
	26,002	25,547	(456)
Transfers To/From Reserves			
Base budget - Planned Transfers to/(from) Reserves	(1,739)	(1,739)	-
Earmarked reserves: Transfer to/(from) Capital	-	-	-
Invest to Save Reserve	-	583	583
Invest to Save Reserve (from)	-	(583)	(583)
	(1,739)	(1,739)	-
Total	373,676	370,632	(3,044)
Funded By			
WG funding (RSG and NNDR)	(289,522)	(289,522)	-
Council Tax	(84,154)	(84,154)	-
Council Tax Deficit	-	-	-
Total	(0)	(3,044)	(3,044)

APPENDIX 3 School Balances Position

School Name	Opening Reserve 23/4	Final ISB Allocation (inc Post 16)	In Year U/(O) Spend March 24	Closing Reserve 31/03/24
	£	£	£	£
Bassaleg School	688,103	9,210,006	(642,835)	45,268
Newport High	467,836	6,263,772	(436,101)	31,735
Caerleon Comprehensive	481,691	7,557,495	(242,454)	239,238
The John Frost School	868,055	7,944,446	(585,808)	282,247
Llanwern High	623,817	5,898,346	(413,244)	210,573
Lliswerry High	373,491	6,135,663	(48,002)	325,489
St Josephs R.C. High	692,782	7,208,801	(362,530)	330,253
St Julians School	1,247,263	8,103,401	(574,998)	672,265
Ysgol Gyfun Gwent Is Coed	248,971	2,910,105	(178,077)	70,893
Sub Total	5,692,010	61,232,035	(3,484,050)	2,207,960
Always Primary	182,838	1,790,357	(145,837)	37,001
Caerleon Lodge Hill	170,699	1,444,080	(64,813)	105,886
Charles Williams CIW	711,625	2,014,348	(314,673)	396,952
Clytha Primary	20,600	967,542	(15,357)	5,243
Crindau Primary	215,536	1,701,817	(85,443)	130,093
Eveswell Primary	625,722	1,842,472	(162,590)	463,132
Gaer Primary	66,296	2,036,572	(43,157)	23,138
Glan Usk Primary	345,969	2,439,005	(126,892)	219,077
Glan Llyn Primary	362,335	2,078,018	92,226	454,561
Glasllwch Primary	48,668	953,927	(46,451)	2,217
High Cross Primary	34,693	1,083,984	(15,740)	18,953
Jubilee Park	271,870	1,588,865	(153,505)	118,365
Langstone Primary	201,600	1,334,543	(174,552)	27,049
Llanmartin Primary	151,052	830,391	(109,955)	41,096
Lliswerry Primary	48,832	2,341,034	10,422	59,254
Maesglas Primary	36,860	1,303,731	(20,972)	15,887
Maindee Primary	107,393	2,185,056	(95,343)	12,050
Malpas CIW Primary	43,818	1,183,151	(3,454)	40,364
Malpas Court Primary	65,103	1,367,445	(62,620)	2,483
Malpas Park Primary	253,430	1,009,325	(98,086)	155,344
Marshfield Primary	119,988	1,749,316	(86,863)	33,125
Millbrook Primary	208,686	1,416,720	(150,825)	57,860
Milton Primary	155,501	2,047,705	(66,100)	89,401
Monnow Primary	69,584	1,790,137	(41,375)	28,209
Mount Pleasant	58,640	1,042,274	(30,579)	28,060
Pentrepoeth Primary	44,950	1,815,652	2,779	47,729
Pillgwenlly Primary	(72,203)	2,557,855	115,021	42,819
Ringland Primary	139,537	1,177,600	(139,302)	235
Rogerstone Primary	114,039	2,446,399	(66,538)	47,501
Somerton Primary	143,469	793,842	(8,169)	135,300
St Andrews Primary	175,597	3,087,581	(45,770)	129,827
St Davids RC Primary	195,048	949,503	(118,035)	77,014
St Gabriels RC Primary	134,835	842,433	(34,954)	99,881
St Josephs RC Primary	94,670	860,073	(31,601)	63,069
St Julians Primary	370,870	2,596,859	(204,057)	166,813
St Marys Rc Primary	269,924	1,630,972	(130,208)	139,716
St Michaels RC Primary	81,330	959,025	(79,504)	1,825
St Patricks RC Primary	126,764	893,202	(55,840)	70,925
St Woolos Primary	39,221	1,358,881	(43,267)	(4,046)
Tredeggar Park Primary	594,736	1,832,943	(246,347)	348,390
Ysgol Gym Bro Teyrnnon	339,915	923,865	(79,580)	260,335
Ysgol Gym Casnewydd	283,581	1,551,337	(51,430)	232,150
Ysgol Gym Ifor Hael	117,100	882,535	(82,914)	34,186
Ysgol Gym Nant Gwenlli	312,007	627,420	253,362	565,369
Sub Total	8,082,726	67,329,792	(3,058,887)	5,023,839
Newport Nursery	123,199	306,375	(44,765)	78,434
Sub Total	123,199	306,375	(44,765)	78,434
Maes Ebbw	297,340	4,347,665	(148,901)	148,439
Bryn Derw	231,101	3,075,611	(191,992)	39,109
Sub Total	528,441	7,423,276	(340,893)	187,548
Assumed additional grant and other compensation			1,100,000	1,100,000
Grand Total	14,426,375	136,291,478	(5,828,594)	8,597,781

Reserve	Balance at 31-Mar-23 (£'000)	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Jan	Feb	Mar	Balance at 31-Mar-24 (£'000) (Forecast)
	£'000	£'000	£'000	£'000	£'000	£'000	£'000	£'000	£'000	£'000	£'000	£'000	£'000	£'000
Theatre & Arts Centre	(232)													(232)
Environmental Health - Improve Air Quality	(49)													(49)
City Economic Development Reserve (<i>see separate tab for detail</i>)	(370)													(370)
Welsh Language Standards	(100)												55	(45)
Port Health	(20)													(20)
Financial System Upgrade	(437)												242	(195)
Events	(282)													(282)
Voluntary Sector Grants	(27)													(27)
IT Development	(53)													(53)
Joint Committee City Deal Reserve	(662)													(662)
Civil Parking Enforcement	(11)													(11)
Business Support	(81)													(81)
Business Development Grants	(250)													(250)
IT Infrastructure (<i>see separate tab for detail</i>)	(309)													(309)
PSB Contribution	(5)													(5)
COVID Reserve (<i>see separate tab for detail</i>)	(351)												-	(351)
Chief Education Grant	(2,208)												309	(1,899)
Home to School Transport - St Andrews / Millbrook	(314)				(509)								291	(532)
Housing Supply review	(16)													(16)
Cariad Casnewydd	(166)													(166)
Community Gardening Schemes	(180)													(180)
Market Arcade owner contributions	(51)													(51)
Parks & Open Spaces	(2,090)													(2,090)
Discretionary Rate Relief	(900)													(900)
Domiciliary Care Service Capacity (now Direct Payments)	(34)												34	-
St. Andrews Primary	(152)												19	(133)
Communications Corporate Requirement	(232)													(232)
Growing space - 2 years	(100)												50	(50)
Spring Gardens - short breaks service	(200)												200	-
Residential Care Home Equalisation Reserve	(621)													(621)
Partnership funding - ABUHB - Windmill Farm	(57)													(57)
Levelling up	(38)													(38)
Cost of living Support Scheme Reserve	(485)													(485)
Prior year underspend	(5,065)				4,964									(101)
Empty Homes	-				(159)									(159)
Transporter Bridge	-				(53)									(53)
SUB TOTAL - OTHER RESERVES	(16,169)	-	-	-	4,243	-	-	-	-	-	-	-	1,200	(10,726)
RESERVES TOTAL	(138,868)	-	-	-	-	-	-	-	-	-	-	-	11,592	(127,276)

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Report

Cabinet

Part 1

Date: 13 September 2023

Subject **Capital Programme Monitoring and Additions Report – July 2023**

Purpose To provide Cabinet with a forecast of capital outturn against budget based on the activity incurred up to the end of July 2023.

To submit to Cabinet for approval, requests for new capital projects to be added to the Council's Capital Programme.

To request Cabinet approval to carry forward budget following the reprofiling exercise that has happened through July and August for existing project expenditure into the future financial years.

To update Cabinet on the current available capital resources ('headroom').

To update Cabinet on the position in relation to Treasury Management prudential indicators as at July 2023.

Author Chief Accountant / Assistant Head of Finance

Ward All

Summary The Council has an extensive capital programme, investing across the authority in areas such as schools, heritage assets, energy efficiency schemes, invest to save programmes and in the regeneration of the city centre. This report updates the Cabinet on its capital programme and the predicted outturn for the 2023/24 financial year, and specifically.

- The starting capital programme budget for 2023/24 was £94.8m. Additions (largely grants) have increased the budget by net £6.3m and reprofiling of budgets into future years have reduced this year's budget by £15.8m, and revisions of £388k to provide a revised budget of £84.868m.
- Against this budget, costs are predicted to be £84.835m introducing a £33k projected underspend.

Proposal

1. **To approve the additions to the Capital Programme requested in the report (Appendix A).**
2. **To note the predicted capital expenditure outturn position for 2023/24.**
3. **To approve the reprofiling of £15.8m from the 2023/24 budget into future years.**
4. **To note the available remaining capital resources ('headroom') and the earmarked usage of that resourcing.**

5. To note the inclusion of the Treasury Management prudential indicators, included within the report.

Action by Assistant Head of Finance

Timetable Immediate

This report was prepared after consultation with:

- Service Budget Holders and Project Managers
- Capital Assurance Group
- Norse Representatives
- Head of Finance

Signed

Background

The Council has a 5-year capital programme, with the current one beginning in 2023/24. Going forward, the Capital Programme will be a rolling 5 year programme, with a new year added on each year. Cabinet receive monitoring updates throughout the financial year and the Capital Programme has been updated to reflect changes as they are received i.e. additions and slippage (moving budget into future years). Following the same approach as last year, approval of slippage, and associated revisions to budgets, will only be sought once this financial year as part of the reprofiling exercise that has been undertaken, with final approval for slippage being sought at the end of the financial year when outturn is known.

These revisions and the changes made to the programme throughout the financial year are shown in summary form in the table below, the detail of which is shown in Appendix A.

Table 1: Current Capital Programme

	2022/23 Budget Outturn	2023/24 Budget Budget	2024/25 Budget Budget	2025/26 Budget Budget	2026/27 Budget Budget	2027/28 Budget Budget	Total
	£'000	£'000	£'000	£'000	£'000	£'000	£'000
Initial Budget	61,225	94,783	53,627	14,645	8,441	18,448	251,169
Revisions / Reprofiting Additions/deletions/ Amendments		-15,833 5,917	2,495 -150	13,017 -2,901	351 0	-30 -12,649	0 -9,783
Revised July 2023 Budget	0	84,868	55,972	24,761	8,792	5,769	241,387

Revisions

As highlighted in Table 1, the 'initial budget' which agrees to the programme outturn for 2022/23, reported to Cabinet in July 2023, shows that the capital programme for 2023/24 is significant. Mindful of the scale of planned spend in this year, an exercise has recently been completed with budget managers to review capital budgets and reprofile projects/expenditure into subsequent years. The budget changes and their associated funding are detailed in Appendix A and introduce a budget reduction in 2023/24 with a corresponding increase in later years. However, even following that exercise, the revised capital programme for 2023/24 is still £84.868m, which is still substantial and will be challenging to deliver in full. Therefore, it is anticipated that further slippage will be confirmed as the year progresses, although hopefully this will be minimised as much as possible.

Additions

The growth to the capital programme is materially affected by the volume of extra grants secured by Council officers, some of which are the outcome of bidding processes that occur, predominantly with Welsh Government. The table below provides a summary of the additions to date, with Appendix A providing a detailed list of all additions.

Nature	Value £'000
New Grants and Contributions	5,683
Section 106 funding	96
Service/Council funding	0
Capital Receipts funding	0
Reserve funding	526
External Contributions	0
Finance Lease	0
Total	6,305

Spending/Outturn 2023/24

Against a budget of £84.868m, costs predicted to be incurred total £84.835m, introducing a £33k net variance.

The following table reflects the activity per service area, with a more detailed scheme by scheme analysis in Appendix B.

Services	Capital Expenditure 2023/24					
	23/24 Budget approved July Cabinet	Additions / Amendments	Reprofiling	23/24 Budget to be approved September Cabinet	Forecast	Over / Underspend
Education	45,566	876	(10,844)	35,599	35,599	0
Environment & Public Protection	7,051	1,911	(1,136)	7,826	7,826	0
Housing & Communities	104	0	0	104	104	0
People, Policy & Transformation	3,728	113	(169)	3,672	3,672	0
Prevention & Inclusion	3,324	0	(213)	3,111	3,101	(10)
Regeneration & Economic Development	23,088	158	(1,213)	22,032	22,031	(1)
Social Services	3,019	72	(681)	2,410	2,410	0
City Services	8,904	2,788	(1,577)	10,114	10,092	(22)
Total	94,783	5,917	(15,833)	84,868	84,835	(33)

The column of “true” over and underspends that service managers will be eradicating or afforded throughout the year are reflected in the last column and total only £33k net underspend at the moment, and which is largely the net effect of grant that is unlikely to be used in full.

The main areas of particular note for the first monitoring of July 2023 are as follows.

- **Education**
 - **Bassaleg School** – the building will be available for handover on 28th Aug 23, with all site works schedule to be completed by November 23.
 - **Whiteheads** - due to delays because of site contamination that needed to be addressed, £4,400k is being slipped into 24-25
 - **St Mary’s School** - £1,286k being slipped into 24-25 due to delays to design works, mainly due to the topography of the site and consultation with the site developer
 - **St Andrew’s** - £510k being slipped into 24-25 due to delays with planning approval being granted
 - **ALN grant** - £1,049k being forecast to be slipped into 24-25. The grant award letter was only received towards the end of July 23. Some spend may be incurred during 23-24, though a decision is still needed to be made regarding which projects to undertake and which will then still require to be tendered for.
- **Transporter Bridge** – Due to inflationary pressures and in recognition of market conditions the Heritage Fund has made an award of an additional £485k to support the scheme. Given the listed status of the bridge and the ecological sensitivities of the River Usk, the project remains one the most complex and constrained schemes undertaken by Newport City Council. The additional funding award will be utilised to increase contingency funding to the project and help meet the cost of revisions to the refurbishment package or unforeseen works.
- **Leisure centre** - £1.127m has been slipped into 24-25 to more realistically reflect the anticipated timeframe of the development.
- **Cambridge House** - £681k being slipped into 24-25 as completion of the refurbishment is not likely until May 2024.

Policy on available capital resources ('Capital Headroom')

Since February 2018, the Council has been working within a framework which maximises capital expenditure funded from sources other than borrowing and within that afforded within the Council's Medium Term Financial Plan. This was updated in the Capital and Treasury Management Strategy agreed in March 2023. The framework agreed that:

- a. Funding from sources other than borrowing needs to be maximised, by securing grant funding whenever possible and maximising capital receipts;
- b. Any change and efficiency schemes requiring capital expenditure, and generating savings as a consequence, would be funded by offsetting the capital financing costs against the savings achieved;
- c. Schemes and projects which generate new sources of income would need to fund any capital expenditure associated with those schemes.

The framework seeks to limit the revenue pressures resulting from increased borrowing as far as possible, whilst maximising capacity to generate capital resources for use.

As approved in the 2023/24 Capital and Treasury Management Strategy, because of the extremely challenging financial context facing the Council, the scope for additional borrowing over and above that approved in previous years is severely limited. Therefore, unless the financial outlook improves, it is possible that the only available capital resources will be limited to those outlined in the table below. Because of that, the new capital programme comprises annual sums, for activity such as asset maintenance, and unfinished schemes carried forward from the previous programme, which are detailed within Appendix B in the report. The size of the current programme will be challenging to deliver itself and any further additions, via the headroom, will add to the overall deliverability challenge of the programme.

Borrowing, Capital Reserves & Receipts Headroom to 2024/25	£'000
Unallocated Capital Expenditure Reserve	11,612
Unallocated Capital Receipts*	1,541
Sustainable Communities for Learning - SOP Extension	(1,267)
Millbrook Primary School demolition (subject to approval)	(600)
Borrowing Headroom	1,057
Potential Commitment - Northern Gateway regeneration match funding	(1,000)
Total	11,342

The unallocated capital expenditure reserve has increased by £2.170m since outturn following the decision made in July Cabinet to transfer part of the 2022/23 underspend into the capital expenditure reserve. Subsequent to that, it has been identified that it is necessary to demolish Millbrook Primary School and a commitment from the headroom is required in order to fund that. That commitment is subject to Cabinet approval via a specific report on this matter and, therefore, is only provisional at this stage. It may be possible that Welsh Government match funding, at 65%, could be made available and replace part of the Council's up front funding.

Update on Capital Receipts

Appendix D provides details of the receipts received this year to date, which together with the unallocated balance brought forward provides headroom of £1.6m to afford new capital aspirations.

That table also shows capital receipts held for the NCC/WG 'Joint Venture funds' totalling £2.2m. In relation to these receipts, the Council doesn't have unilateral decision in their use. Commonly, it will

involve engagement with Welsh Government and, as previously reported to Cabinet, these funds tend to be “ringfenced” for city centre regeneration given the original asset sales involved.

Prudential Indicators April – July 2023/24

The 2021 Treasury Management Code introduced a new requirement that monitoring of the treasury management indicators and non treasury management indicators should be reported on a quarterly basis. These are detailed in Appendix D. As of 31st July 2023, the Authority has complied with all of its treasury management indicators.

Risks

Risk Title / Description	Risk Impact score of Risk if it occurs* (H/M/L)	Risk Probability of risk occurring (H/M/L)	Risk Mitigation Action(s)	Risk Owner
Overspend against approved budget	M	L	Regular monitoring and reporting of expenditure in accordance with the timetables set by Cabinet/Council should identify any issues at an early stage and allow for planned slippage of spend.	Corporate Directors / Heads of Service / Head of Finance
Programme growing due to unforeseen events	M	M	Good capital monitoring procedures and effective management of the programme should identify issues and allow for plans to defer expenditure to accommodate urgent works. Priority asset management issues are now being dealt with through a specific programme allocation. Capital headroom exists and can be accessed where absolutely necessary.	Corporate Directors / Heads of Service / Head of Finance
Excessive levels of slippage between financial years	M	H	Regular monitoring of capital expenditure takes place and slippage is identified at the earliest stage possible. A more robust approach will be taken when schemes are added to the programme to ensure that a realistic profile is initially captured in the programme. An internal Capital Assurance Group has been created and will regularly review progress against schemes and hold officers to account for delivery.	Corporate Directors / Heads of Service / Head of Finance

* Taking account of proposed mitigation measures

Links to Council Policies and Priorities

The programme supports a large number of the Council’s aims and objectives.

Options Available and considered

- To approve the changes to the Capital Programme and note the projected outturn position as set out in the report, including the use of capital receipts.
- To note the current available headroom and prioritise future capital expenditure in order to maintain spend within the current affordability envelope.
- The Cabinet has the option not to take forward some or all of the changes to the Capital Programme set out in the report.

Preferred Option and Why

- To approve the changes to the Capital Programme and note the projected outturn position as set out in the report, including the use of capital receipts.
- Agree to prioritise capital expenditure to maintain spend within the current affordability envelope, recognising that the revenue pressures from future borrowing can add to any budget gap reflected in the MTFP.

Comments of Chief Financial Officer

This report provides an overview of the 2023/24 capital programme monitoring position, as at July 2023. It includes the impact of the recently undertaken reprofiling exercise, which was necessary due to the significant starting budget position for the year, which was unlikely to be deliverable in full. This has resulted in nearly £16m being transferred to future years and, after allowing for recent additions to the programme, a revised budget of £85m. Despite this reduction in the in-year budget, delivering the programme in full will be challenging and further slippage in the year is possible. However, the introduction of the new Capital Assurance Group should provide a greater focus on delivery and slippage.

The report also outlines the level of capital headroom available. This currently stands at £11.342m, after assuming the new commitment for Millbrook Primary School. Whilst the level of available headroom is now higher than it was a year ago, it should be noted that this could easily be consumed by a small number of issues arising. In addition, supplementing this headroom is limited to additional capital receipts and any use of revenue underspends to increase the Capital Expenditure Reserve. As well as this, the scope to undertake new borrowing is extremely limited, when considering the challenging medium term outlook the Council is facing, exacerbated by the increasing cost of actual borrowing resulting from high interest rates.

Because of these factors, approving commitments from the headroom needs to be done only where absolutely necessary and unavoidable. Where pressures do emerge, alternative funding sources, such as external grants, should be pursued, with new Council borrowing being the absolute last resort and only where it is clearly affordable, prudent and sustainable to do so. As a result, the Council will need to be very careful in its use of capital resources and clear prioritisation of issues and aspirations is required.

Comments of Monitoring Officer

There are no legal issues arising from this report.

Comments of Head of People, Policy & Transformation

The report provides Cabinet with a forecast of the Councils Capital Programme and predicted outturn for the 2023/24 financial year, with any additions to the programme submitted for approval. Good capital monitoring procedures and effective management of the programme form the basis for sound and sustainable investment in Council assets and the estate. Current and further budget additions will need to continue to be considerate of the requirements of the Well-being of Future Generations Act for public bodies to apply the five ways of working to financial planning, which balances short-term priorities with the need to safeguard the ability to meet long-term needs.

There are no direct HR implications associated with the report. A Fairness and Equality Impact Assessment wasn't required but are considered as part of service delivery and will feature in annual finance reports.

Scrutiny Committees

N/A

Fairness and Equality Impact Assessment:

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

For this report, a full Fairness and Equality Impact Assessment has not been undertaken. This is because this report is not seeking any strategic decisions or policy changes, with its purpose being to update Cabinet on the prior year financial performance against the approved Capital Programme. However, fairness and equality are considered as part of service delivery and will feature in annual finance reports, such as the Budget Report and Capital Strategy.

An effective capital programme enables the Council to support long term planning in line with the sustainable development principle of the Wellbeing of Future Generation (Wales) Act

Long-term - This capital programme looks at both short and long term and links with the Corporate Plan and its priorities. It considers the overall capital programme in terms of the Council's Treasury Management activities and its associated costs, both short and long term to the Council.

Prevention – The capital programme, where possible, acts to prevent problems occurring or getting worse by considering the overall Council estate and how that can best be managed and maintained.

Integration - This report meets a number of wellbeing goals and, in addition, supports three of Newport City Council's wellbeing objectives;

- To promote economic growth and regeneration while protecting the environment
- To enable people to be healthy, independent and resilient
- To build cohesive and sustainable communities

Collaboration - The capital programme is developed and updated through engagement across the Council and certain projects are also being delivered in collaboration with other external bodies which helps the Council meet its Wellbeing objectives.

Involvement – Due to the variety of projects which are within the capital programme, there is involvement from a variety of stakeholders across the Council and the city which seeks to ensure that there is a key focus on sustainability, community benefit and wellbeing of citizens.

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.

The development and the monitoring of the Capital programme will ensure it does not discriminate but promotes equality and delivers the objectives of the corporate plan.

Consultation

N/A

Background Papers

Capital Strategy and Treasury Strategy – March 2023
Capital Outturn report 2022/24

Dated: 5 September 2023

Appendix A – Additions and changes to the Programme

Funding Source	Narrative	2022/23 Budget	2023/24 Budget	2024/25 Budget	2025/26 Budget	2026/27 Budget	2027/28 Budget	TOTAL Budget for this Capital Plan Duration
		£'000	£'000	£'000	£'000	£'000	£'000	£'000
	April Budget as agreed by July Cabinet	61,225	94,783	53,627	14,645	8,441	18,448	251,170
	ADDITIONS / DELETIONS							
	Education							
Grant	23-24 ALN Grant Funding		1,049					1,049
	Environment & Public Protection							
Grant	Public EV Charging		120					120
Grant	Three Weekly Containers and ULEV Vehicles		1,169					1,169
Section 106	Pill Mill and Ruperra Street Play Area		96					96
Reserves	TT City Centre Green Infra		180					180
Reserves	Kingsway PV solar panels		346					346
	Regeneration & Economic Development							
Grant	Transporter Bridge		485					485
	Social Services							
Grant	VAWDASV Target Hardening Equipment		46					46
Grant	23-24 Disbursed Accommodation		26					26
	Infrastructure							
Grant	CA Pontymason Lane		740					740
Grant	Safe Routes in Communities		130					130
Grant	20mph Core Allocation 2324		341					341
Grant	ATF Newport Central Connections		59					59
Grant	Bus Stop Infrastructure 23/24		309					309
Grant	A467 Improvements (Resilient Roads)		500					500
Grant	EV Charging Infrastructure		672					672
Grant	Station Road Flood Alleviation Scheme		37					37
	Total Additions and Deletions	0	6,305	0	0	0	0	6,305
	Amendments							

Gwent Is Coed Sports Hall				(805)			(805)
SPF		(270)	(150)				(420)
Gwent Assistive Technology in Social Care		(60)					(60)
City Deal - Cost of Carry				(2,096)		(12,649)	(14,745)
Transporter Bridge		(58)					(58)
Sub Total Amendments	0	(388)	(150)	(2,901)	0	(12,649)	(16,088)
Reprofiling - July 22/23 Monitor		(15,833)	2,495	13,017	351	(30)	0
REVISED BUDGET	61,225	84,868	55,972	24,761	8,792	5,768	241,387

Appendix B – Detailed Budget Breakdown of the 5 year cabinet programme

	*Spend 18/19 - 22/23 £'000	April Budget 23/24 £'000	Additions	Slippage/ reprofiling	July Forecast	Under / Overspend	Budget 24/25 £'000	Budget 25/26 £'000	Budget 26/27 £'000	Budget 27/28 £'000
Iscoed Secondary Band B	18,435	276	-	-	276	-	-	-	-	-
Bassaleg Secondary Band B	21,403	10,020	-	32	10,051	-	651	-	-	-
Caerleon Secondary Band B	328	132	-	132	-	-	4,500	6,000	672	-
Whiteheads Primary Band B	1,746	11,771	-	4,418	7,353	-	5,101	-	-	-
Maesglas Primary Band B	7	1,260	-	1,260	-	-	-	1,793	-	-
Maindee Primary B	8	-	-	-	-	-	-	992	-	-
Llanwern Village Primary Schools Band B	2	-	-	-	-	-	792	400	-	-
St Andrews Demountables Band B	1,180	6,795	-	510	6,285	-	2,535	-	-	-
Welsh Medium Primary School	1,442	1,379	-	1,086	293	-	1,407	2,659	-	-
ED Tech Grant	297	65	-	-	65	-	-	-	-	-
Charles Williams Renovations	992	2,105	-	-	2,105	-	-	-	-	-
Pentrepoeth - site accessibility	482	212	173	-	39	-	-	-	-	-
St Mary's Urgent Capital repairs grant	61	2,051	-	1,285	766	-	2,763	-	-	-
Education Maintenance Grant - 19/20	1,731	25	-	-	25	-	-	-	-	-
Education Maintenance Grant - 20/21	1,252	1,264	-	511	753	-	511	-	-	-
Education Maintenance Grant - 21/22	1,876	802	-	-	802	-	-	-	-	-
Education Maintenance Grant - 22/23	-	1,725	-	-	1,725	-	830	-	-	-
Education Accessibility Studies - Phase 1	279	19	-	-	19	-	-	-	-	-
Education Accessibility Studies - Phase 2	4	628	-	623	5	-	623	-	-	-
Free school meals capital works	908	2,158	-	-	2,158	-	-	-	-	-
Open Schools Outside Hours	376	646	-	-	646	-	-	-	-	-
Supporting Learners with Additional Learning Needs	42	980	-	-	980	-	-	-	-	-
23-24 ALN Grant Funding	43	-	1,049	1,049	-	-	1,049	-	-	-
Gwent Is Coed Sports Hall	-	1,252	-	-	1,252	-	2,085	-	-	-
Education - Sub total		45,566	876	10,844	35,599	-	22,848	11,843	672	-
Refit	415	1,585	-	226	1,359	-	226	-	-	-
Kingsway Solar Panels		-	347	-	347	-	-	-	-	-

Tredegar Park Cycle improvements	137	16	-	-	16	-	-	-	-	-
Local Places for Nature Grant	249	385	-	-	385	-	467	-	-	-
Parks Improvements	35	1,065	-	-	635	430	635	-	-	-
Cemeteries Improvements	375	1,025	-	-	275	750	275	-	-	-
Gwent Green Grid GI Project	2	67	-	-	67	-	-	-	-	-
Gwent Green Grid Access Project	30	43	-	-	43	-	-	-	-	-
Docksway Landfill Capping Works	1,443	587	-	-	587	-	-	-	-	-
Public EV Charging	7	4	120	-	124	-	-	-	-	-
Schools LED Lighting	300	182	-	-	182	-	-	-	-	-
Three Weekly Containers and ULEV Vehicles		-	1,169	-	1,169	-	-	-	-	-
Pill Mill and Ruperra Street Play Area		-	96	-	96	-	-	-	-	-
City Centre Green Infrastructure		-	180	-	180	-	-	-	-	-
SPF -Community Building decarbonisation/energy efficiency		125	-	-	125	-	250	-	-	-
SPF - Mon+Brecon Canal 14 Locks		1,236	-	-	1,236	-	454	-	-	-
SPF - Tredegar Park		732	-	-	732	-	1565	-	-	-
Environment & public protection - Sub total		7,051	1,911	-	1,136	7,826	-	3,872	-	-
Gypsy/Traveller Site Development	3,111	44	0	0	44	-	0	-	-	-
SPF - Food resilience programme	-	60	0	0	60	-	60	-	-	-
Housing & communities - Sub total		104	0	0	104	-	60	0	0	0
IT Replacement Schemes	602	319	0	-169	150	-	414	202	150	150
Asset Management Programme	7,231	2218	173	0	2391	-	1,500	1,500	1,500	1,500
Civic Centre / Info Station										
Service Relocations	236	29	0	0	29	-	-	-	-	-
Information Station		157	0	0	157	-	-	-	-	-
Library (infostation move)	1,267	234	0	0	234	-	-	-	-	-
Boundary Wall	4	47	0	0	47	-	-	-	-	-
Central Library - Structural Works	153	510	-	-	510	-	-	-	-	-
Assistive Technology in Social Care	-	214	-60	0	155	-	-	-	-	-

People, policy & transformation - Subtotal		3,728	113	-	169	3,672	-	1,914	1,702	1,650	1,650
Disabled Facilities	4,313	1,725	-	-	363	1,362	-	1,213	1,000	1,000	1,000
Safety at Home	1,778	300	-	-	150	450	-	300	300	300	300
ENABLE Adaptations Grant	1,031	197	-	-	-	197	-	-	-	-	-
Childcare - Flying Start	1,805	97	-	-	-	97	-	-	-	-	-
Small Grant Scheme Childcare Offer	332	14	-	-	-	14	-	-	-	-	-
Small Grants Funding Childcare Offer	-	470	-	-	-	470	-	-	-	-	-
Flying Start Project Management Costs	-	50	-	-	-	50	-	-	-	-	-
SMAPF	1,516	423	-	-	-	423	-	-	-	-	-
GDAS - Outreach Service provision,	-	47	-	-	-	37	-	-	-	-	-
Prevention & inclusion - Sub total		3,324	-	-	213	3,101	-	1,513	1,300	1,300	1,300
Market Arcade Townscape	-	-	-	-	-	-	-	-	-	-	-
Heritage Scheme	2,088	689	-	-	-	689	-	-	-	-	-
Cardiff City Region Deal	1,405	2,690	-	-	175	2,865	-	2,415	2,722	-	-
Cardiff City Region Deal - Cost of Carry	-	-	-	-	-	-	-	-	291	2,352	-
Mill Street Development Loan	3,739	261	-	-	261	-	-	261	-	-	-
TRI Thematic Funding	460	828	-	-	-	828	-	-	-	-	-
Clarence House Loan	48	702	-	-	-	702	-	-	-	-	-
Transforming Towns Placemaking	20	548	-	-	-	548	-	332	-	-	-
Transforming Towns Business Fund	27	98	-	-	-	98	-	-	-	-	-
Transporter Bridge - Phase 2 Delivery	4,202	11,314	428	-	-	11,742	-	807	-	-	-
Medieval Ship	11	1	-	-	-	-	-	-	-	-	-
Placemaking capital projects	-	500	-	-	-	500	-	-	-	-	-
Leisure centre New build	2,283	2,270	-	-	1,127	1,143	-	12,209	4,086	-	-
Coleg Gwent Demolition Costs	-	1,246	-	-	-	1,246	-	-	-	-	-
Shared Prosperity Fund	-	1,940	-	270	-	1,670	-	4,093	-	-	-
Regeneration & economic development - Sub total		23,088	158	-	1,213	22,030	-	20,118	7,098	2,352	-
Telecare Service Equipment	172	62	-	-	-	62	-	30	30	30	30
Equipment for Disabled Grant (GWICES)	825	165	-	-	-	165	-	165	165	165	165

Rosedale Annexes	80	420	-	-	420	-	-	-	-	-	-	
Disbursed accommodation and Covid-19 equipment	677	156	26	-	182	-	-	-	-	-	-	
Cambridge House - HCF Grant	30	1,620	-	-	681	939	-	681	0	0	0	
Forest Lodge HCF grant funding	75	596	-	-	596	-	-	0	0	0	0	
VAWDASV Target Hardening Equipment		-	46	-	46	-	-	0	0	0	0	
Social Care - Sub total		3,019	72	-	681	2,410	-	876	195	195	195	
Gwastad Mawr Flood Attenuation Works		36	-	-	14	-	22	-	-	-	-	
City Services Annual Sums	1,690	2,558	-	-	871	1,687	-	1,371	500	500	500	
CA Pontymason Lane	1,691	-	740	-	740	-	-	-	-	-	-	
Peterstone Sewage Scheme	908	13	-	-	13	-	-	-	-	-	-	
Fleet Replacement Programme	7,831	2,684	-	-	706	1,978	-	2,829	2,123	2,123	2,123	
Carnegie Court Emergency River Works	1,244	19	-	-	19	-	-	-	-	-	-	
Private sector bus electrification	3,300	3,023	-	-	3,023	-	-	-	-	-	-	
Placemaking capital projects (hostile vehicle)		571	-	-	571	-	-	571	-	-	-	
Station Road Flood Alleviation Scheme		-	37	-	37	-	-	-	-	-	-	
Safe Routes in Communities		-	130	-	130	-	-	-	-	-	-	
20mph Core Allocation 23/24		-	341	-	341	-	-	-	-	-	-	
ATF Npt Central Connections		-	59	-	59	-	-	-	-	-	-	
Bus Stop Infrastructure 23/24		-	309	-	309	-	-	-	-	-	-	
A467 Improvements (Resilient Roads)		-	500	-	500	-	-	-	-	-	-	
EV Charging Infrastructure		-	672	-	672	-	-	-	-	-	-	
City Services - Sub Total		8,904	2,788	-	1,577	10,092	-	4,771	2,623	2,623	2,623	
TOTAL EXPENDITURE		94,783	5,919	-	15,833	84,835	-	33	55,972	24,761	8,792	5,768
Financed By:												
General Capital Grant		4,268	-	-	4,268	-	-	4,268	4,268	4,268	4,268	
Supported Borrowing		4,155	-	-	4,155	-	-	4,155	4,155	-	-	
Unsupported Borrowing		20,171	-	-	1,693	18,478	-	10,967	3,587	2,374	-	
Prudential Borrowing		-	-	-	-	-	-	-	-	-	-	
External Grants		45,408	5,296	-	8,474	42,197	-	27,355	9,189	650	-	
S106		3,751	96	-	1,338	2,509	-	255	2,062	-	-	
Other Contributions		523	-	-	14	510	-	14	-	-	-	
Capital Receipts		5,121	-	-	1,911	3,211	-	2,461	-	-	-	
Revenue Contributions		1,622	-	-	-	1,622	-	1,542	1,500	1,500	1,500	
Reserves		9,763	527	-	2,404	7,886	-	4,953	-	-	-	

Finance Lease	-	-	-	-	-	-	-	-	-
TOTAL	94,783	5,919	-	15,834	84,835	55,972	24,761	8,792	5,768

Appendix C – Recent Capital Receipts Activity

Asset Disposed	Receipts Received in Year	Total Available Receipts 2023/24
	£	£
Balance b/f from 2022/23		7,613
GENERAL CAPITAL RECEIPTS		
Sale of Land	56	
Total Sales		56
Amount used in 2022/23	-	0
Commitments within the Capital Programme		
Fleet Replacement Programme	- 410	
Replacement for Education maintenance grant funding 20/21 used on general activities	- 835	
Replacement for Free Schools grant - displaced funding	- 1,985	
Replacement for Education maintenance grant funding 20/21 used on general activities		
New Leisure Centre	- 1,000	
St Mary's Primary School	- 950	
Newport Centre demolition (Council share)	- 892	
Total Usage		- 6,072
Total Amount Uncommitted		1,597
NEWPORT UNLIMITED		
Balance b/f from 2022/23		2,216
Total Amount Uncommitted		2,216
TOTAL NCC RECEIPTS (Uncommitted)		3,813

Appendix D - Prudential Indicators April – July 2023/24

Non Treasury Prudential Indicators

The Authority measures and manages its capital expenditure, borrowing service investments (where applicable) with references to the following indicators. It is now a requirement of the CIPFA Prudential Code that these are reported on a quarterly basis.

Capital Expenditure: The Authority has undertaken and is planning capital expenditure as summarised below;

Table 1: Prudential Indicator: Estimates of Capital Expenditure and Capital Financing in £ millions

	2022/23 Budget Outturn	2023/24 Budget Budget	2024/25 Budget Budget	2025/26 Budget Budget	2026/27 Budget Budget	2027/28 Budget Budget	Total
	£'000	£'000	£'000	£'000	£'000	£'000	£'000
Initial Budget	61,225	94,783	53,627	14,645	8,441	18,448	251,169
Revisions / Reprofiled	0	0	0	0	0	0	0
Additions/deletions/ Amendments	0	-15,833	2,495	13,017	351	-30	0
	0	5,917	-150	-2,901	0	-12,649	-9,783
	0	0	0	0	0	0	0
Revised July 2023 Budget	0	84,868	55,972	24,761	8,792	5,769	241,387

The detail behind the movements and the changes in forecast are discussed at the beginning of the report.

Capital Financing Requirement: The Authority's cumulative outstanding amount of debt finance is measured by the capital financing requirement (CFR). This increases with new debt-financed capital expenditure and reduces with MRP and capital receipts used to replace debt.

The actual CFR is calculated on an annual basis.

Table 2: Prudential Indicator: Estimates of Capital Financing Requirement in £ millions

	31/03/23 Actual	31/03/24 Forecast	31/03/25 Indicative	31/03/26 Indicative	31/03/27 Indicative	31/03/28 Indicative
TOTAL CFR	273.4	285.1	288.1	279.5	269.4	257.0

The forecast CFR for 2023/24 has increased from the budget within the Capital and Treasury Strategy however, over the current capital programme, the CFR has actually decreased following the removal of City Deal.

Gross Debt and the Capital Financing Requirement: Statutory guidance is that debt should remain below the capital financing requirement, except in the short term. The Authority has complied and expects to continue to comply with this requirement in the medium term as is shown below.

Table 3: Prudential Indicator: Gross Debt and the Capital Financing Requirement in £ millions

	31/3/2023 Actual	31/3/2024 Forecast	31.3.2025 Budget	31.3.2026 Budget	31.3.2027 Budget
Debt (incl. PFI & leases and ST & LT borrowing)	177	174	186	197	192
Capital Financing Requirement	273	285	288	279	269

Debt and the Authorised Limit and Operational Boundary: The Authority is legally obliged to set an affordable borrowing limit (also termed the Authorised Limit for external debt) each year. In line with statutory guidance, a lower “operational boundary” is also set as a warning level should debt approach the limit.

	Maximum debt Q1	Debt at 31.7.23	2023/24 Authorised Limit	2023/24 Operational Boundary	Complied?
	2023/24				Yes/No
Borrowing	198	138	246	150	Yes
PFI and Finance Leases	39	36	39	39	Yes
Total debt	237	174	285	189	

Since the operational boundary is a management tool for in-year monitoring it is not significant if the boundary is breached on occasions due to variations in cash flow, and this is not counted as a compliance failure.

Proportion of Financing Costs to Net Revenue Stream: Although capital expenditure is not charged directly to the revenue budget, interest payable on loans and [MRP / loans fund repayments] are charged to revenue.

The net annual charge is known as financing costs; this is compared to the net revenue stream i.e. the amount funded from Council Tax, business rates and general government grants.

Table 5: Prudential Indicator: Proportion of financing costs to net revenue stream

	2023/24 Budget	2023/24 Forecast	2024/25 budget	2025/26 budget
Financing costs* (£m)	23	20.5	22.8	23.2
Proportion of net revenue stream	6.10%	5.48%	5.90%	5.80%

New Capital Expenditure to be funded via borrowing; The table below shows the limit of new capital expenditure that can be funded via borrowing. There has been no new capital schemes funded by borrowing so far within 2023/24

Table 6: Local Prudential Indicator: New capital expenditure to be funded via borrowing (£m)

	2023/24 limit	2024/25 limit*	2025/26 limit*
Borrowing headroom	1.1	0	0

Treasury Management Prudential Indicators

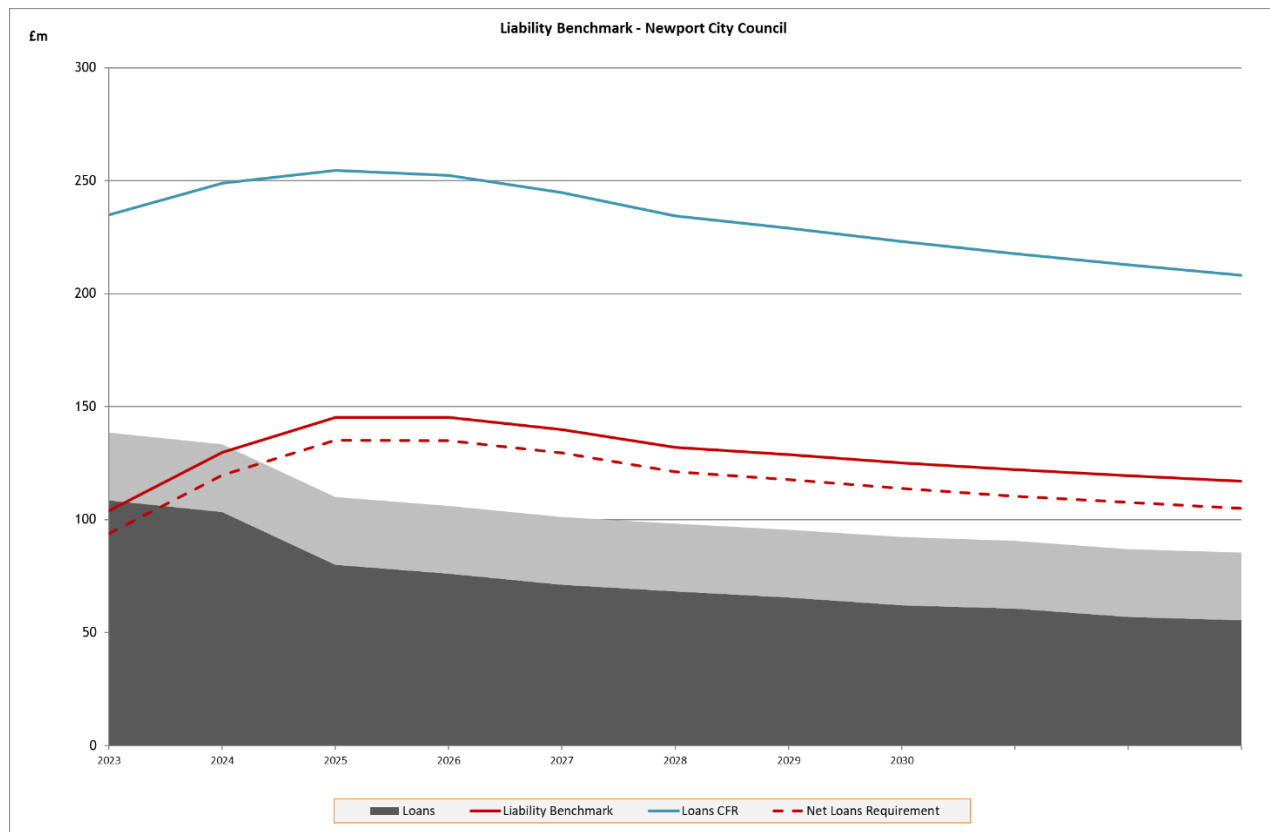
As required by the 2021 CIPFA Treasury Management Code, the Authority monitors and measures the following treasury management prudential indicators.

1. Liability Benchmark:

This new indicator compares the Authority’s actual existing borrowing against a liability benchmark that has been calculated to show the lowest risk level of borrowing. The liability benchmark is an important tool to help establish whether the Council is likely to be a long-term borrower or long-term investor in the future, and so shape its strategic focus and decision making. It represents an estimate of the cumulative amount of external borrowing the Council must hold to fund its current capital and revenue

plans while keeping treasury investments at the minimum level of £10m required to manage day-to-day cash flow.

The chart below contains a number of elements, which are explained below:



The blue line reflects the accumulated value of historic, and future, unfunded capital expenditure – i.e. expenditure initially funded by borrowing and then funded via the revenue budget, over time, in the form of MRP (Minimum Revenue Provision). In effect, this line represents the gross amount of borrowing required.

The solid red line is the calculated actual/real level of borrowing required, taking into account the Council’s internal borrowing capacity (i.e. the value of balance sheet resources at any point in time). The gap between the blue and red lines represents the internal borrowing capacity.

The grey shaded areas represent the actual borrowing undertaken by the Council as of 31 July 2023 and shows how these loans reduce as they are scheduled for repayment.

The white gap between the solid red line and the grey shaded areas represents the estimated amount of new borrowing required over the next ten years. A large proportion of this new borrowing would be to replenish existing maturing borrowing, with the remainder being required as a result of the Council’s capital expenditure plans.

Maturity Structure of Borrowing: This indicator is set to control the Authority’s exposure to refinancing risk. The upper and lower limits on the maturity structure of all borrowing were:

Refinancing rate risk indicator	Upper limit	Lower limit	31.07.23 Actual	Complied?
Under 12 months	60%	0%	5%	Yes
12 months and within 24 months	40%	0%	17%	Yes
24 months and within 5 years	40%	0%	8%	Yes

5 years and within 10 years	40%	0%	10%	Yes
10 years and within 20 years	30%	0%	27%	Yes
20 years and within 30 years	20%	0%	3%	Yes
30 years and within 40 years	20%	0%	18%	Yes
40 years and within 50 years	20%	0%	4%	Yes
50 years and above	20%	0%	7%	Yes

Time periods start on the first day of each financial year. The maturity date of borrowing is the earliest date on which the lender can demand repayment.

Long-term Treasury Management Investments: The purpose of this indicator is to control the Authority's exposure to the risk of incurring losses by seeking early repayment of its investments. The prudential limits on the long-term treasury management limits are:

	2023/24	2024/25	2025/26
Limit on principal invested beyond year end	£10m	£10m	£10m
Actual principal invested beyond year end	£10m	£10m	£10m
Complied?	Yes	Yes	Yes

Long-term investments with no fixed maturity date include strategic pooled funds, real estate investment trusts and directly held equity but exclude money market funds and bank accounts with no fixed maturity date as these are considered short-term.

Interest Rate Exposures: This indicator is set to control the Authority's exposure to interest rate risk. Bank Rate rose by 0.5% during the first four months of the financial year to 5%, this is now 5.25% as of 3rd August 2023.

Interest rate risk indicator	2023/24 Target	31.7.23 Actual	Complied
Upper limit on one-year revenue impact of a 1% <u>rise</u> in interest rates	200,000	72,708	Yes
Upper limit on one-year revenue impact of a 1% <u>fall</u> in interest rates	100,000	22,500	Yes

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Report

Cabinet

Part 1

Date: 13 September 2023

Subject Demolition of Millbrook Primary School

Purpose To seek approval for the demolition of the current Millbrook Primary School building.

Author Assistant Head of Education – Resources

Ward Bettws

Summary In July 2022, the Council was advised of potentially significant problems at Millbrook Primary School. This resulted in the school being temporarily relocated to Brynglas Adult Training Centre whilst further structural investigations were undertaken by a specialist contractor. Their report indicated that the school building should not be re-occupied in its current condition. The school has continued to operate from Brynglas Adult Training Centre since September 2022, and the Millbrook Primary School building has remained vacant.

In recent months the vacant building has been subject to significant break-ins, resulting in extensive vandalism and anti-social behavior, and it is anticipated that these problems will continue whilst the building remains empty. In early September 2023, the Council agreed to progress a replacement school build rather than repair and remodel the existing building. As such, the current building will not be reoccupied and is considered obsolete. Given the significant health and safety risks presented by this vacant building, approval is now sought for its demolition.

Proposal To agree that the current Millbrook Primary School building should be declared as surplus and that arrangements can be made for its demolition, and approve for £600,000 to be allocated from the Council's Capital Headroom to fund the scheme.

Action by Chief Education Officer

Timetable Immediate

This report was prepared after consultation with:

- Corporate Management Team
- Education Senior Management Team
- Senior HR and Finance Business Partners
- Headteacher and Governing Body of Millbrook Primary School

Signed

Background

Millbrook Infant and Junior Schools were originally built in 1958. The two schools operated separately but from within the same building for many years and were later amalgamated into a single one-and-a-half form entry school. The school building had capacity for 315 pupils of statutory school age, plus a 20-place nursery class providing 40 part-time placements, and hosted a Flying Start setting.

Over the summer of 2022, building issues were identified at Millbrook Primary School which resulted in the school being temporarily relocated to Brynglas, in the previous Adult Training Centre building, whilst further structural investigations were carried out. The report prepared following these investigations indicated that the school building should not be re-occupied in its current condition. Outline costs provided in the autumn term of 2022 suggested that a financial commitment in the region of £10.4m would be needed to refurbish and upgrade of major fabric elements of the building, and enable safe reoccupation.

The Council has used the remainder of the 2022/23 academic year to investigate, consider and agree the most appropriate long-term solution for the Millbrook Primary School community and, in early September 2023, agreed to progress a replacement school build rather than repair and remodel the existing building. This will require a multi-million-pound investment through the next wave of Welsh Government's Sustainable Communities for Learning programme, and will provide a modern teaching environment. Due to the timescales of this programme, a new school cannot be delivered quickly. In the interim, therefore, Millbrook Primary School will continue to operate from the temporary facility at Brynglas.

This also means that the current Millbrook Primary School building will not be reoccupied and is therefore considered obsolete within the Council's asset portfolio. Despite extensive efforts by the Council to secure the building through the installation of steel shutters over all ground floor window and door access points, there are daily break-ins resulting in significant instances of vandalism and anti-social behaviour.

Although the steel shutters are being continually repaired and replaced, it is apparent that the vandalism within the building has resulted in numerous broken windows, widespread access to the roof, damage to walls and panels which has dislodged asbestos and electrical wiring, and increased fire risk. The Council has engaged with Gwent Police and the South Wales Fire Service to identify ways in which these issues and risks can be mitigated and is currently procuring 24-hour security for the site.

In summary, the building currently poses a health and safety risk. Given that the Council no longer has a need for this obsolete building, approval is sought for its demolition on the grounds of health and safety within the local community.

Costs and Timescales

Newport Norse has provided a cost estimate of £600,000 for the proposed full demolition of the current building. A more accurate estimate will only be possible after seeking quotations from the market.

Consent for the demolition will also have to be secured in line with normal planning procedures. This will include submitting a method of demolition statement, a site restoration plan and undertaking relevant surveys. Whilst the application will be progressed as quickly as possible, a definitive timescale of when this could be feasibly achieved cannot be confirmed at this stage. An indicative programme timeline provided by Newport Norse currently suggests a completion date of June 2024.

Officers are investigating best options for procurement, and this will hopefully bring this date forward. In addition, once the tender is awarded, the contractor can erect hoardings ready for demolition and create a secure site compound. Under this arrangement, site security would be the responsibility of the appointed contractor, pending the demolition works taking place. Under the draft timeline, this is currently estimated as January 2024.

Financial Summary

Capital

The one-off capital costs associated with the demolition of the building will initially be funded in full by the Council. However, colleagues in Welsh Government have confirmed that the demolition works can be included as part of the overall replacement school build project, and as such, these early costs will also benefit from their agreed intervention rate of 65% for all Sustainable Communities for Learning projects.

Revenue

There are no revenue costs associated with this proposal, however by progressing the demolition, the Council will be able to avoid the costs associated with securing the site.

Risks

It is important to identify and manage any project or scheme's exposure to risk and have in place controls to deal with those risks.

Risk Title / Description	Risk Impact score of Risk if it occurs* (H/M/L)	Risk Probability of risk occurring (H/M/L)	Risk Mitigation Action(s) <i>What is the Council doing or what has it done to avoid the risk or reduce its effect?</i>	Risk Owner <i>Officer(s) responsible for dealing with the risk?</i>
The vacant school building continues to be a target for vandalism and anti-social behaviour.	H	H	A Risk Assessment is in place and is being regularly reviewed. In addition, the Council has engaged with Gwent Police and the South Wales Fire Service to identify ways in which identified issues and risks can be mitigated. Round-the-clock site security has been procured on a temporary basis.	Chief Education Officer
Delays in securing consent and appointing a contractor to undertake the demolition works	H	L	Colleagues across the Council will work together to prioritise these works as quickly as possible given the risks presented by the vacant building.	Chief Education Officer
The vacant building is demolished prior to plans for a replacement school build are agreed.	M	L	The Council has announced an intention to progress a replacement school build, and this will be prioritised through the next wave of investment under the Sustainable Communities for Learning programme.	Chief Education Officer

* Taking account of proposed mitigation measures

Links to Council Policies and Priorities

Wellbeing of Future Generations (Wales) Act 2015

Corporate Plan

Education Service Plan

Options Available and considered

Option 1: To maintain the status quo, and agree that the Council should continue to manage the risks associated with the vacant building.

Option 2: To declare the vacant building as surplus, and therefore progress arrangements for its demolition, including allocating £600,000 from the Council's Capital Headroom towards the cost of the scheme.

Preferred Option and Why

The preferred option is Option 2. This will remove the risks associated with this vacant and obsolete building. Plans for the replacement school build will be shared with the school community in due course, with the current temporary arrangements continuing in the medium-term.

Comments of Chief Financial Officer

Whilst it is expected that Welsh Government will ultimately be able to fund the demolition costs as part of the overall replacement of the school, at the 65% intervention rate under the Sustainable Communities for Learning programme, this has not yet been confirmed so there is a requirement to commit the full £600k up front. As and when a full replacement scheme is approved, the Council's contribution will effectively reduce to £210k by virtue of Welsh Government contributing £390k towards these specific costs.

The recommendations to this report ask the Cabinet to approve the use of £600k of the current available headroom for this scheme. The current level of available headroom stands at £11.9m and will reduce to £11.3m if this scheme is taken forward. The amount required will be specifically committed from the Capital Expenditure Reserve, which comprises the majority of the available headroom.

Whilst the amount required is clearly affordable from within the headroom, it should be noted that this reduces the remaining level of headroom at a time when increasing the level of capital resources, especially via new borrowing, is challenging. Therefore, it remains important that the capital headroom is only committed for the highest priorities, so as to not fetter the ability to respond to critical issues at a later date.

Although committing to this scheme means that scarce capital resources are utilised up front, it will assist the Council in avoiding the ongoing cost of security associated with the site in its current form.

Comments of Monitoring Officer

The Council has a specific obligation under section 13 of the Education Act 1996 to secure efficient primary and secondary education to meet the needs of the population of the area. In order to do so the Council has to maintain the schools in its area to a prescribed standard and as the owner of educational premises has legal obligations and a duty of care to ensure the wellbeing of staff and students. Specialist structural investigations have concluded that Millbrook School premises should not be re-occupied. This report identifies that due to the risks associated with the occupation of current school building, the preferred and safest option is for it to be demolished and replaced.

This report seeks approval for demolition of the current school premises on safety grounds. Should the demolition be approved, there are both Planning and Building Control requirements to be attended to before the demolition can take place. The demolition would be considered to be development requiring planning consent. However, Part 31 of Schedule 2 of the General Permitted Development Order 1995 grants permitted development rights for "any building operation consisting of the demolition of a building". Nevertheless, it will be necessary to apply to the Planning Department for a determination as to whether prior approval will be required for the method of demolition and the scheme of restoration. Advice should be taken from the Planning Department as to the procedure to be followed. When the Planning requirements have been satisfied and demolition is programmed to go ahead, Building Control must be notified in writing of the intention to demolish the building. Details must be provided of matters such as the extent of the demolition and any precautionary measures to safeguard neighbours and the

general public. Once sufficient information is submitted, Building Control will issue a certificate which will allow the demolition to proceed.

Comments of Head of People, Policy and Transformation

Following the identification of structural problems at Millbrook Primary School resulting in the transfer of teaching to an alternative site, the Council in September 2023, decided to progress a replacement school build rather than repair and remodel the existing building. This will require a multi-million-pound investment by the Council through the next wave of the Sustainable Communities for Learning programme and will provide a modern teaching environment for the future in an area of relative deprivation.

The existing site is now a target for anti-social behaviour and vandalism which will impact on local residents. In order to prevent further health and safety, nuisance and environmental issues at the site it is proposed that the vacant building should be demolished at an early stage. This proposal follows discussions with partners and supports the work of the Safer Newport Community Safety Partnership.

There are no direct human resources issues arising from this report.

Scrutiny Committees

None

Fairness and Equality Impact Assessment:

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

The Well-being of Future Generations (Wales) Act seeks to improve the social, economic environmental and cultural well-being of Wales. Public bodies should ensure that decisions consider the impact they could have on people living in Wales in the future. The Council has always sought to engage with residents before taking any decision which may impact upon the delivery of any public service in accordance with the principles of fairness and legitimate expectation. The sustainable development principle and 5 ways of working set out in the Wellbeing of Future Generations Act have been considered as outlined below:

- Long term: the importance of balancing short- term needs with the need to safeguard the ability to also meet long-term needs: **The Council has announced an intention to progress a replacement school build for the Millbrook community, and as such the current school building is now obsolete. Given the health and safety risks posed in maintaining this building, demolishing it safeguards the school community and supports opportunities for future development.**
- Prevention: How acting to prevent problems occurring or getting worse may help us meet our objectives. **The vacant building contains potentially hazardous materials and is a target for vandalism and anti-social behaviour. Demolishing the building at an early stage will resolve these problems and mitigate the risk to the public.**
- Integration: Consider how the proposals will impact on our wellbeing objectives, our wellbeing goals, other objectives or those of other public bodies. **This proposal supports the “A prosperous Wales” and “A Wales of cohesive communities” Well-being Goals and has no adverse effect on any of the other Well-being Goals.**
- Collaboration: have you considered how acting in collaboration with any other person, or any other part of our organisation could help meet our wellbeing objectives. **In managing the problems associated with this vacant building, the Council has liaised with and taken advice from Gwent Police and South Wales Fire Service.**
- Involvement: The importance of involving people with an interest in achieving the wellbeing goals and ensuring that those people reflect the diversity of the City we serve. **The Council will engage with the school and the local community to ensure that they understand the reasons for this demolition in advance of any replacement school build. This could include specifically**

targeted sessions with pupils of the school. Further information around the replacement school build will be shared with the school community in due course.

A Fairness and Equality Impact Assessment has been completed in respect of this proposal and accompanies this report.

Crime and Disorder Act 1998

The actions proposed in the report seek to minimise anti-social behaviour in the area.

Consultation

None, but as demolition consent will be required in order to move this forward, this will be undertaken in accordance with the statutory requirements enforced by Regeneration and Economic Development.

Background Papers

FEIA

Dated: 5 September 2023

Fairness and Equalities Impact Assessment (FEIA)

This is an integrated Impact Assessment which aims to ensure Newport City Council makes decisions which are fair, take account of relevant evidence, and seek to secure the best outcomes for our communities. **An FEIA should be used to inform the first steps of decision-making, at concept stage, not when a decision is already made, or at the point when it cannot be influenced.** This impact assessment considers our legislative responsibilities under:

- The Equality Act (2010), including the Socio-economic Duty
- The Wellbeing of Future Generations (Wales) Act (2015)
- The Welsh Language (Wales) Measure (2011)

The FEIA process is not intended to prevent decisions being made, but to ensure we have considered their potential impact. An FEIA also helps us to focus on how we can reduce any negative impacts, and provides us with evidence that we have met our legal duties.

For support to complete your FEIA, please contact the [Connected Communities Team](#)

What do we mean by Fairness?

The Newport Fairness Commission is an independent body which advises the council on the best use of resources and powers to achieve the fairest outcomes for local people. The Fairness Commission has established four **Principles of Fairness** which should be considered as part of any decisions that the council make – the questions below are useful to reflect on before you start your FEIA.

Equity	Are people being treated in a consistent way, whilst acknowledging their differences (for example, need, barriers to accessing services)?
	Will the gap between those with more, and those with less be reduced?
	Have the interests of different groups affected (including minority or disadvantaged communities) been taken into account?
Priority	Have the needs of the most disadvantaged and vulnerable across the city been given priority?
	Have you considered possible indirect consequences for minority/disadvantaged communities when other priorities are directing decisions?
Inclusion	Will the voices of all those affected by your decision be heard?
	Are people able to participate in and shape a service, as well as receiving it?
	Have you considered the impact of your decision on the relationship between communities, and the spaces they share?
Communication	Are decisions being made transparently and consistently?
	How will decisions be communicated to people who are affected in a clear way, with the opportunity for feedback?

Part 1: Identification

Name of person completing the FEIA	Robert Fisher
Role of person completing the FEIA	Education Information & Development Officer
Date of completion	23rd August 2023
Head of Service who has approved this FEIA	Sarah Morgan

1. What is being assessed? *(Please double click on the relevant box(es) (X) and select 'checked' as appropriate)*

- New or revised policies, practices or procedures (which modify service delivery or employment practices)
- Service review or re-organisation proposals which affect the community and/or staff
- Efficiency or saving proposals
- Setting budget allocations for new financial year and strategic financial planning
- Decisions affecting service users, employees or the wider community including (de)commissioning or revising services
- New project proposals affecting staff, communities or access to the built environment
- Public events
- Local implementation of National Strategy/Plans/Legislation
- Strategic directive and intent, including those developed at Regional Partnership Boards and Public Service Boards
- Medium to long term plans (for example, corporate plans, development plans, service delivery and improvement plans)
- Setting objectives (for example, well-being objectives, equality objectives, Welsh language strategy)
- Major procurement and commissioning decisions
- Decisions that affect the ability (including external partners) to offer Welsh language opportunities and services
- Other *please explain in the box below:*

2. Please describe the overall aims, objectives and intended outcomes of your decision

The intended outcome is to obtain permission to progress with the demolition of the vacant and condemned Millbrook Primary School building.

In July 2022, Newport City Council was advised of potentially significant problems at Millbrook Primary School; this resulted in the school being temporarily relocated to Brynglas Adult Training Centre while further structural investigations were undertaken. The report prepared by a specialist contractor following these investigations indicated that the school building should not be re-occupied in its current condition. The school has therefore continued to operate from Brynglas Adult Training Centre since September 2022, with the Millbrook Primary School building remaining vacant since this time.

In recent months the vacant building has been subject to significant break-ins, resulting in extensive vandalism and anti-social behaviour. These problems will worsen whilst the building remains empty. The Council has now agreed to progress a replacement school build rather than repair and remodel the existing building. As such, the current building is now considered obsolete. Given the significant health and safety risks presented by this vacant building, approval is now sought for its demolition.

3. Who are the main stakeholders who may be impacted by your decision and what data do you hold on them? Consider communities of place (people who live in the same geographic area) and communities of interest (people who share particular characteristics but may live in different geographic areas). Stakeholders may include residents, local businesses, community groups, staff or partners.

The key stakeholders are:

- Pupils attending Millbrook Primary School
- Parents and families of pupils currently attending Millbrook Primary School;
- Teachers, staff and governors at Millbrook Primary School;
- Families with pre-school aged children in the Bettws area.
- Families with children moving into the Bettws area.

The key stakeholders most likely live or access services in the Bettws area of Newport. Millbrook Primary School is located within the Bettws ward.

The information provided below is based on information from the Newport community well-being profiles. There were six local community well-being profiles produced for 2021 which were published on 5th May 2022 prior to the ward changes implemented at local council elections in 2022.

The Bettws ward represents approximately 5.2% of Newport's total population. The table below shows the makeup of the Bettws ward population against the all-Newport population using the mid-year population estimates 2020 data from the One Newport ward profiles. The data shows that the area matches the same averages than the Newport-wide figure. The Bettws ward has an area of 5.14 km², the population density within the ward is 1,582 people per km² which is ranked 13th most densely populated of the 20 Newport wards.

Population (Mid-year population estimates 2020)				
	Total	Aged 0 to 15	Aged 16 to 64	Aged 65+
Bettws	8,132	1,703 (21%)	5,076 (62%)	1,353 (17%)
Newport	156,447	32,050 (21%)	97,743 (62%)	26,654 (17%)

The population in the Bettws ward decreased between 2001 and 2011 but has seen growth over the past 10 years from 2011, whereas the whole Newport population has also grown significantly in the past 20 years.

Population 2001 – 2020 (2001 – 2011 Census Figures) (Mid-year population estimates – 2020)			
	2001	2011	2020
Bettws	8,278	7,606	8,132
Newport	137,011	145,736	156,447

Approximately 5% of the primary cohort within Newport currently attend Welsh-medium primary schools. 10.5% of the primary cohort within Newport attend Faith-based primary schools. We would expect to see similar percentages of families opting for these mediums of education from the Bettws ward. Newport City Council's Welsh in Education Strategic Plan (WESP) has recently been approved by Welsh Government and proposes to establish more Welsh-medium provision in Newport between 2022-2032 and aims to increase the percentage of primary age pupils in Welsh-medium education to 12%. Ysgol Gymraeg Ifor Hael, located in the Bettws ward has a capacity of 210 pupils is one of four Welsh-medium primary schools in Newport. The 2022/23 Reception

year group as of PLASC 2023 was full and the 2023/24 Reception class for September 2023 is currently full although a small number of places have been offered to out-of-catchment applicants.

The table below shows that over the last 5 years there has been a slight increase of pupils eligible for Free School Meals (FSM) in Millbrook Primary School. The Millbrook Primary FSM figures are significantly higher than the Newport and Wales average.

Free School Meals (FSM)					
	2018	2019	2020	2021	2022
Millbrook Primary	28.4%	27.0%	27.7%	31.7%	33.9%
Newport	19.2%	19.3%	19.6%	21.5%	22.4%
Wales	18.4%	18.5%	19.3%	21.3%	23.0%

Millbrook Primary School is located within the Bettws ward. The FSM data aligns with the ward profile data, Millbrook Primary School is located between the Bettws 2 and Bettws 6 LSOA and both LSOA are ranked within the top 50% of most deprived wards in Wales. Bettws 2 is within the top 20% of most deprived wards in Wales making Bettws one of the most deprived wards in Newport.

The table below shows the percentage of children learning English as an additional language in Millbrook Primary School.

English as an additional language (EAL)					
	2018	2019	2020	2021	2022
Millbrook Primary	11.6%	8.8%	5.9%	5.0%	4.9%
Newport	18.1%	17.8%	18.0%	17.4%	16.9%
Wales	6.2%	6.0%	6.1%	6.0%	6.1%

The proportion of pupils for whom English is an additional language has decreased steadily in 5 years in Millbrook Primary School, the proportion of EAL pupils remains significantly below the Newport average.

Black, Asian and Minority Ethnic Pupils					
	2018	2019	2020	2021	2022
Millbrook Primary	14.4%	17.6%	12.8%	12.2%	14.4%
Newport	26.7%	27.5%	28.1%	28.3%	29.2%
Wales	12.2%	12.5%	12.7%	12.9%	13.3%

The proportion of Black, Asian and Minority Ethnic Pupils has fluctuated in Millbrook Primary School over 5 years, but as a percentage, the school population remains significantly below the Newport average.

Part 2: Engagement

When completing this section, you need to consider whether you have sufficient information about the views and experiences of people who your decision will impact upon. If you don't, you may need to undertake a period of engagement/consultation before continuing. An FEIA is a live document, so can be updated with consultation findings, and amended as needed during the decision-making process.

The council has a duty to consult and engage with people who may experience inequalities as a result of your decision. This includes people **who share Protected Characteristics** (age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex and sexual orientation) and people who **have lived experience of socio-economic disadvantage**. The council's Youth Promise also requires us to ensure **all young people in Newport are listened to and included in decisions affecting them**.

The council also has a duty to ensure that any consultation is available bilingually (in Welsh as well as English), and you may like to consider any other community languages that are spoken by people who may be impacted by your decision. Below are some questions that should be included in any public consultation relating to a decision which may impact on the use of Welsh language in Newport:

1. Do you believe that the proposed decision/policy will have a positive or negative effect on opportunities to use the Welsh language?
2. If you think it will have a negative effect, what steps could we take to lessen or remove this and improve positive effects?
3. Do you believe that the proposed decision/policy will treat the Welsh language less favourably than the English language?

1. How have you engaged with people who may be affected by your decision (the stakeholders you have identified)?

If permission to take this proposal forward is granted, the identified stakeholders will be kept informed during the demolition process. Documentation and progress will be published on the Newport City Council web pages and site notices will be posted at the school gates.

Letters on progress will be distributed via the school and information shared on social media platforms such as Twitter and Facebook.

All information shared will be available bilingually in Welsh and English and questions and concerns can be submitted bilingually. Any questions or concerns submitted in Welsh will receive an answer in the same language.

2. What do you know about the views or experiences of people who may be affected by your decision?

We know that local families and the school community have been frustrated by the closure of the Millbrook School site and some have found adapting to the temporary arrangements and transport provision difficult. Although this proposal confirms that the temporary arrangement will remain for the short-to-medium-term, the decision to provide a replacement building and the proposed demolition of the old school represents progress and will provide a better long-term solution.

The people affected by the decision are the parents/carers, pupils and staff of Millbrook Primary School and young families within the Bettws ward.

The FSM and EAL figures for the school indicate the school community has a relatively high proportion of low-income households and the vast majority speak English as a first language. The Black, Asian and Minority Ethnic figures for the school community have fluctuated over the past 5 years but the figures indicate the school community is predominantly of White-British ethnicity.

Pupils attending Millbrook Primary School and school staff are key stakeholders in this proposal as they will continue to attend the temporary facility at Brynglas Adult Training Centre (ATC). There are currently 276 pupils on roll at Millbrook Primary School in Reception – Year 6 classes. The table below shows the total pupil numbers at the school broken down by year group.

Millbrook Primary School (Reception – Year 6)								
Pupil Numbers – PLASC 2023								
Year	Reception	Year 1	Year 2	Year 3	Year 4	Year 5	Year 6	Total
2022/23	31	39	43	37	45	38	43	276

The low intake in Reception in 2022 reflected in the 2023 PLASC census could be attributed to an unusually low birth rate in the corresponding birth year (2018). However, the low intake could also be linked to the recent structural issues with the Millbrook Primary School building and the relocation of the school to the Brynglas ATC. The birth rates for the catchment area are shown below, they suggest Reception numbers could increase but the September 2023 Reception allocation numbers don't reflect a large increase in pupil numbers with only 32 places allocated as of 15th August.



Part 3: Assessment

This section requires you to assess the potential impact of your decision on a range of groups who may experience specific disadvantages. Your assessment should be supported by evidence – either from your own engagement/consultation, similar or previous engagement, what you already know about the people who access your service, or from local and national sources of information.

Useful documents which set out information about how communities are impacted by inequalities include [EHRC – Is Wales Fairer?](#) and the council's [COVID-19 Community Impact Assessment](#). Your decision may have both positive and negative impacts – if this is the case, please place a cross in both boxes.

1. Impact on people that share Protected Characteristics

[Protected Characteristics](#) are defined under the Equality Act 2010, and describe groups of people who are protected from discrimination, either in the workplace, or through the provision of goods and services. The council must consider how decisions may impact on people differently because of a protected characteristic, and how any negative impact could be reduced. National guidance on assessing equality impacts and the Public Sector Equality Duty can be found [here](#). You can also access further advice and examples of positive and negative impacts [here](#).

Protected characteristic	Impact:			<p>Provide further details about the nature of the impact in the sections below, considering the Public Sector Equality Duty that the council has to:</p> <ol style="list-style-type: none"> Promote equal opportunity across different groups Promote community cohesion Help eliminate unlawful discrimination/ harassment/ victimisation
	Positive	Negative	Neither	
Age	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	The demolition of the Millbrook Primary School building will confirm the requirement for current and future pupils of Millbrook Primary School to continue to attend the Brynglas ATC for the foreseeable future. This will see the current arrangements continue as pupils are transported to Brynglas ATC by bus from the Millbrook Primary School site. This arrangement has worked with Newport Transport team supporting the school with additional buses running to support the school returning to the usual start and end times for the school day. Advice provided to Newport City Council suggests that the demolition and replacement of the building would not take significantly longer than a repair and refurbishment. On this basis the impact of the decision on the situation is considered negligible.
Disability	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	There is no evidence that suggests the demolition will have a disproportionate impact on people that share this Protected Characteristic. The school is inclusive and is accessible to pupils with visibility and mobility needs. The temporary site has been adapted to ensure that it provides a suitable environment to meet the needs of pupils.
Gender Reassignment	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	There is no evidence that suggests the demolition will have a disproportionate impact on people that share this Protected Characteristic.
Marriage or civil partnership	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	There is no evidence that suggests the demolition will have a disproportionate impact on people that share this Protected Characteristic.
Pregnancy or maternity	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Millbrook Primary School not currently having a permanent base may have affected the number of pupils that apply for places in the school while there is uncertainty over the future of the school. The drop in Reception numbers for 2022/23 suggest parents may be applying for places elsewhere as the pupil number in Reception was the lowest in the school, and as of 15/08/2023 the Reception number for 2023/24 is lower

Protected characteristic	Impact:			<p>Provide further details about the nature of the impact in the sections below, considering the Public Sector Equality Duty that the council has to:</p> <ol style="list-style-type: none"> Promote equal opportunity across different groups Promote community cohesion Help eliminate unlawful discrimination/ harassment/ victimisation
	Positive	Negative	Neither	
				than the previous years when the school was at its permanent base. This proposal and the declared intention to replace the building provides a level of assurance in a time of uncertainty.
Race	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	There is no evidence that suggests the demolition will have a disproportionate impact on people that share this Protected Characteristic.
Religion or Belief or non-belief	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	There is no evidence that suggests the demolition will have a disproportionate impact on people that share this Protected Characteristic.
Sex	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	There is no evidence that suggests the demolition will have a disproportionate impact on people that share this Protected Characteristic.
Sexual Orientation	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	There is no evidence that suggests the demolition will have a disproportionate impact on people that share this Protected Characteristic.

2. Impact on Welsh Language

The Welsh Language (Wales) Measure specifies that for all policy decisions, the council must consider the effects (both positive and negative) on the Welsh language. For further guidance on Welsh language considerations see [here](#).

	Impact:			
	Positive	Negative	Neither	
Welsh Language	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<p>Welsh-medium education in the Bettws area is provided at Ysgol Gymraeg Ifor Hael.</p> <p>The demolition affects an English-medium school. The demolition is to demolish an unsafe school building within the English-medium sector. The demolition could directly affect the Welsh-medium sector as Ysgol Gymraeg Ifor Hael is within the immediate vicinity of Millbrook Primary School and could see the amount of in catchment applications for Ysgol Gymraeg Ifor Hael rise if parents choose to keep their children within the local area.</p> <p>The proposal has no impact on the Council's plans for growing Welsh-medium education provision across Newport as outlined in our 10-year Welsh in Education Strategic Plan. It is therefore acknowledged that this proposal will not contribute to the Council's targets in relation to Cymraeg 2050.</p>

1. Please describe how you have ensured your engagement has considered the view of Welsh speakers in Newport and the impact of your decision on the Welsh language.

All documentation published will run bilingually.




In order to ensure that an equitable consultation is achieved in both Welsh and English, Newport City Council:



- Will ensure all publicly available documentation will be available bilingually
- Will ensure all stakeholder emails are bilingual
- Will ensure there will be a Welsh language version of the consultation web page on the NCC website
- Will provide translation services at drop in session where appropriate
- Will encourage stakeholders to respond to the consultation in Welsh

- Will ensure the consultation questionnaire asked specific questions in relation to the project’s potential positive or negative impact on opportunity to promote and use the Welsh language

3. The Sustainable Development Principle

The Well-being of Future Generations Act puts in place a sustainable development principle which helps organisations consider the impact they could have on people living in Wales in the future, and ensure they are focused on tackling long-term challenges. Below, consider how your decision promotes, advances, or contradicts the [5 ways of working](#) which underpin the sustainable development principle. You can access further guidance on considering the sustainable development principle [here](#).

<p>Long term</p> 	<p><i>The importance of balancing short-term needs with the need to safeguard the ability to also meet long-term needs.</i></p>	<p>The Council has announced an intention to progress a replacement school build for the Millbrook community, and as such the current school building is now obsolete. Given the health and safety risks posed in maintaining this building, demolishing it at an early stage safeguards the school community and supports opportunities for future development. The intention to progress a replacement building will provide a long term solution for the school community providing a new facility that will last for generations, rather than repair and remodel which may not have as long a lifespan, nor be a suitable to delivery of 21st Century education as a new replacement building.</p>
<p>Prevention</p> 	<p><i>Putting resources into preventing problems occurring or getting worse</i></p>	<p>The vacant building contains potentially hazardous materials and is a target for vandalism and anti-social behaviour. Demolishing the building at an early stage will resolve these problems and mitigate the risk to the public..</p>
<p>Integration</p> 	<p><i>Considering how the public body’s well-being objectives may impact upon each of the well-being goals, on their other objectives, or on the objectives of other public bodies.</i></p>	<p>This proposal supports the “A prosperous Wales” and “A Wales of cohesive communities” Well-being Goals and has no adverse effect on any of the other Well-being Goals.</p>

<p>Collaboration</p> 	<p><i>Working together to deliver objectives.</i></p>	<p>In managing the problems associated with this vacant building, the Council has liaised with and taken advice from Gwent Police and South Wales Fire Service.</p>
<p>Involvement</p> 	<p><i>Involving those with an interest and seeking their view - ensuring that those people reflect the diversity of the area.</i></p>	<p>The Council will engage with the school and the local community to ensure that they understand the reasons for this demolition in advance of any replacement school build. This could include specifically targeted sessions with pupils of the school. Further information around the replacement school build will be shared with the school community in due course.</p>

4. Socio-economic Duty

The [Socio-economic Duty](#) is set out in the Equality Act 2010, and requires the council, when making strategic decisions, to pay due regard to the need to reduce the inequalities of outcome that result from socio-economic disadvantage. Inequalities of outcome are felt most acutely in areas such as health, education, work, living standards, justice and personal security, and participation.

A ‘strategic decision’ is defined by Welsh Government as a decision **which affects how the council fulfils its statutory purpose over a significant period of time and does not include routine ‘day to day’ decisions.** Strategic decisions include:

- Corporate plans
- Setting wellbeing, equality and other strategic objectives
- Changes to, or development of public services
- Strategic financial planning
- Strategic policy development

If you do not think your decision meets this definition, and you do not plan on carrying out a Socio-economic Duty Assessment in this section, please provide your rationale below. Any decision which is presented to a Cabinet Member, at Cabinet or Council will be viewed as a strategic decision.

If your decision does meet the definition, please consider the impact of your decision on the socio-economically disadvantaged groups, and areas of inequality that may arise from socio-economic disadvantage contained in the matrix below. The groups listed are not exhaustive and you should consider any additional groups relevant to your decision who may experience socio-economic disadvantage in the following ways:

- **Low Income/Income Poverty** - cannot afford to maintain regular payments such as bills, food, clothing, transport etc.
- **Low and/or no Wealth** - enough money to meet basic living costs and pay bills but have no savings to deal with any unexpected spends and no provisions for the future
- **Material Deprivation** - unable to access basic goods and services i.e. financial products like life insurance, repair/replace broken electrical goods, warm home, hobbies etc.)
- **Area Deprivation** - where you live (rural areas), where you work (accessibility of public transport)
- **Socio-economic Background** – for example, parents’ education, employment and income

Indicate a positive or negative impact, or both where they apply, and the severity of this impact by coding the sections of the grid based on the below. *If there is no/neutral impact, please leave blank.*

Negative Impact		Positive Impact	
N1	Negative impact – mild	P1	Positive impact – mild
N2	Negative impact – moderate	P2	Positive impact – moderate
N3	Negative impact – significant	P3	Positive impact – significant
N4	Potential for negative impact (but unsure)	P4	Potential for positive impact (but unsure)

Areas of inequality that may arise from socio-economic disadvantage – definitions								
Education :The capability to be knowledgeable, to understand and reason, and to have the skills and opportunity to participate in the labour market and in society								
Work : The capability to work in just and favourable conditions, to have the value of your work recognised, even if unpaid, to not be prevented from working and to be free from slavery, forced labour and other forms of exploitation								
Living Standards : The capability to enjoy a comfortable standard of living, in appropriate housing, with independence and security, and to be cared for and supported when necessary.								
Justice, Personal Security and Community Safety : The capability to avoid premature mortality, live in security, and knowing you will be protected and treated fairly by the law								
Health : The capability to be healthy, physically and mentally, being free in matters of sexual relationships and reproduction, and having autonomy over care and treatment and being cared for in the final stages of your life								
Participation : The capability to participate in decision making and in communities, access services, know your privacy will be respected, and express yourself								
Groups		Areas of inequality						
		Living Standards	Work	Health	Education	Justice and community safety	Participation	Physical Environment
Children living in poverty				P2	P2		P4	P4

Low income households without dependent children							
Unemployed young people							
Long term unemployed							
Homeless households							
Refugees, migrants and asylum seekers							
Deprived neighbourhoods - WIMD rank in 10% most deprived LSOA			P1	P4		P4	P3
People on Universal Credit / income related benefits							
Adults with no qualifications or low qualifications							
People living in low quality housing or in Houses of Multiple Occupation				P4			

1. What evidence do you have about socioeconomic disadvantage and inequalities of outcome in relation to this decision?

As an 'Education' plan, it will reduce potential inequalities of opportunity by demolishing an obsolete and unsafe building, and the intention is then to provide Millbrook Primary School with a replacement building rather than repair and remodel. This will have a positive impact on the community as it will provide progress on an issue within the area and provides an outline of the plan for the future of the school.

2. Please describe how you have ensured your engagement has considered the views of people living in Newport who are affected by socio-economic disadvantage.

The documents will be available digitally and in hard format on a variety of digital platforms online and at Millbrook Primary School.

3. Does this decision contribute to a cumulative impact?

No

Part 3: Actions and Outcomes

Considering any negative impacts that you have identified, indicate below how you will reduce these, increase the potential for positive impacts, and how you will monitor those impacts. Further guidance on how to complete your action plan can be found [here](#).

IMPACT ON PEOPLE THAT SHARE PROTECTED CHARACTERISTICS			
Summary of impact	Action to reduce negative impact / opportunities to increase positive impacts	How this impact will be monitored	Owner
IMPACT ON WELSH LANGUAGE			
Summary of impact	Action to reduce negative impact / opportunities to increase positive impacts	How this impact will be monitored	Owner
SOCIO-ECONOMIC IMPACTS			
Summary of impact	Action to reduce negative impact / opportunities to increase positive impacts	How this impact will be monitored	Owner
SUSTAINABLE DEVELOPMENT PRINCIPLE			
Summary of impact	Action to reduce negative impact / opportunities to increase positive impacts	How this impact will be monitored	Owner

Once your FEIA is complete, please forward to nccequality@newport.gov.uk



Report

Cabinet

Part 1

Date: 13 September 2023

Subject Replacement Local Development Plan (RLDP) – Preferred Strategy

Purpose To update Cabinet on the consultation exercise and endorse the Council's response in relation to the Growth and Spatial Options which has been used to inform the Preferred Strategy Consultation Document. Cabinet approval is sought to endorse commencement of the formal public consultation on the Preferred Strategy Consultation Document, as the next formal step in the preparation of the draft Replacement Local Development Plan (RLDP).

Author Planning Policy Manager

Ward All

Summary Undertaking a consultation on a Preferred Strategy (Pre-Deposit Plan) document is a statutory stage in developing the Replacement Local Development Plan. The Preferred Strategy proposals have been informed by engagement with communities, including consultation on growth and spatial options, and technical work, for example the Integrated Sustainability Appraisal.

A first revision of the Delivery Agreement was endorsed by Cabinet in January 2023. The Delivery Agreement targets a Preferred Strategy Consultation for Autumn 2023.

It is proposed that the Preferred Strategy consultation document is taken forward for public consultation alongside supporting assessments and background papers.

Proposal Cabinet is asked to:

1. **Note the comments on the Growth and Spatial Options (GSO) and endorse the responses provided in Appendix A.**
2. **Endorse the Preferred Strategy consultation paper, provided in Appendix B, and recommend to Council that a formal community consultation is commenced.**

Action by Planning and Development Manager / Head of Regeneration and Economic Development

Timetable Immediate

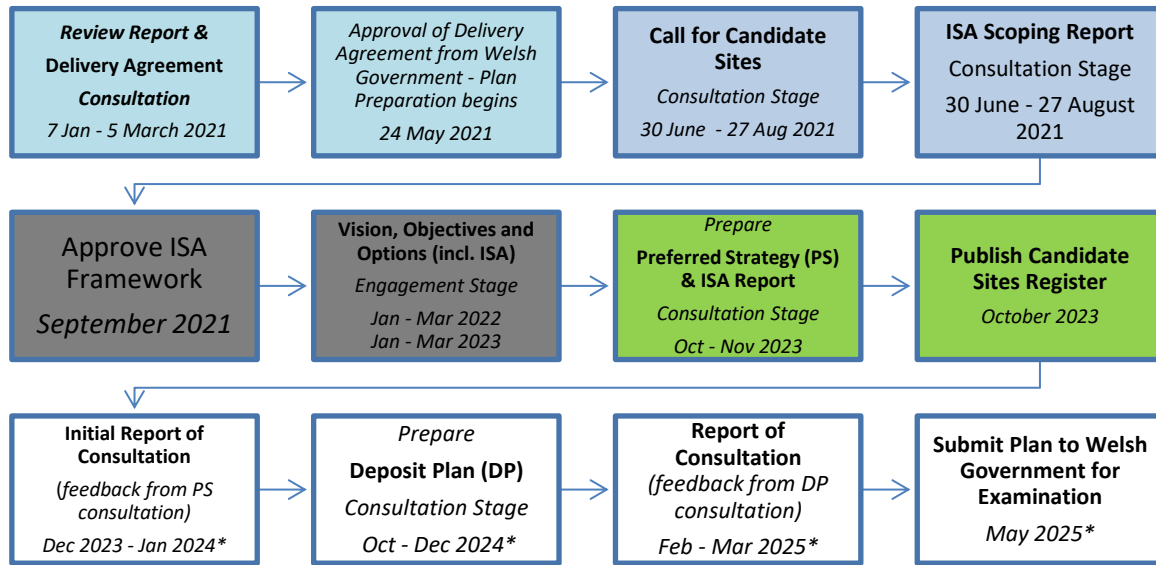
This report was prepared after consultation with:

- Head of Finance
- Head of People, Policy and Transformation
- Head of Law and Standards

Signed

Background

There are many formal stages to the preparation of a RLDP and these key stages are set out below¹:



**Dates are approximate and have been updated to reflect the proposed revision to the Delivery Agreement*

We are currently at the stages highlighted in green – ‘Preferred Strategy (PS) and Integrated Sustainability Appraisal Report (ISA)’ and ‘Publish Candidate Sites Register’. Most recently engagement on the RLDP’s Growth and Spatial Options (GSO) was undertaken during early 2023. Prior to this, consultation on the draft Vision, Issues and Objectives was undertaken in early 2022. The feedback from this earlier consultation was reported to Cabinet in July 2022. Following the close of the GSO consultation, officers have considered the comments received to further refine and determine which growth and spatial options are emerging as the most appropriate for Newport over the period 2021-2036.

Growth and Spatial Options Consultation

Stakeholder engagement is a critical element of the preparation of any Development Plan. Therefore, in addition to the standard formal consultation (direct communication with those on the RLDP database and updates to the Council website) a series of engagement events were undertaken by Planning Aid Wales on behalf of the Council.

Consultation Feedback and Response

The Council directly received 68 formal written responses, each of the representations received are set out in full, alongside the recommended Council response to the comments, in Appendix A of this report.

The purpose of this consultation was to gain views regarding the different growth and spatial options. **Table 1** illustrates the growth options which formed the basis of the consultation, for completeness.

Option	Description	Dwellings		Jobs	
		Per annum	Overall scale	Per annum	Overall scale
1. Dwelling-led 5YR	Models the population impact of an average annual dwelling growth of +838 dwellings per annum (dpa), based on a 5-year history of pre-COVID-19 housing completions in Newport (2015/16–2019/20).	838	12,570	863	12,945
2. WG-2018-HIGHPOP	Replicates the Welsh Government 2018-based high population projection, rebased to the 2021 Census	632	9,480	713	10,695

¹ The term ISA refers to the Integrated Sustainability Appraisal

	population figure and incorporating high fertility, mortality and migration assumptions.				
3. Dwelling-led 10YR	Models the population impact of an average annual dwelling growth of +638 dpa, based on a 10-year history of pre-COVID-19 housing completions in Newport (2010/11–2019/20).	638	9,570	576	8,640
4. WG-2018-Principal	Replicates the Welsh Government 2018-based Principal population projection, using historical population data for 2001–2018.	530	7,950	627	9,405
5. PG-Long Term	Uses an ONS 2020 MYE base year and calibrates its migration assumptions from a 19- year historical period (2001/02–2019/20).	540	8,100	448	6,720
6. Employment-led OE+D&I Uplift	Models the population impact of an average annual employment growth of +389 per year over the plan period, with an uplift applied to the OE economic forecast, based on the Cardiff Capital Region (CCR) city deal direct and indirect employment projections.	507	7,605	389	5,835

Comments received regarding the growth options are summarised in **Table 2**. From **Table 2**, broad conclusions can be drawn that options 1, 2 and 3 are accepted as making a contribution towards Newport’s role within the Cardiff, Newport and the Valleys National Growth Area, and that options 4, 5 and 6 would not meet the needs of a growing population (as confirmed in the 2021 census).

Table 2: Summary of Comments Received on Growth Options		
Stakeholder Type	General Comments on Growth Strategy	Comments on Options
Statutory Bodies	<ul style="list-style-type: none"> Development should be located where it can be served by existing or planned water infrastructure. Not enough regard for historic assets and landscapes Further clarification that historic assets, including buried archaeological remains and built heritage should be preserved in situ as a priority. Support for approach taken which assess the scenarios against RLDP objectives. There is concern that not enough consideration of growth in terms of a Well-being Economy as per Future Wales, is within the GSO. Consideration of Flood Risk, Protected Species, Protected Sites, and Green Infrastructure should be reiterated. 	<p>Growth Option 6 Employment-led OE+D&I Uplift</p> <ul style="list-style-type: none"> Opposition as it is considered that this would result in a low growth strategy and not align with Future Wales.
Agent / Developers / Landowners	<ul style="list-style-type: none"> Support for disregarding lowest options. Flexibility buffer should be well above the 12% incorporated by the adopted LDP. Opposition against the matrix used to assess some of the impacts e.g. health and wellbeing. If there are concerns from Welsh Government regarding the high level of housing growth proposed in the Monmouthshire LDP, then Newport, as somewhere within a National Growth Area, should be a focal point. Some belief that anything delivering below the current 690 dwellings per annum should not be considered. 	<p>Growth Option 1 Dwelling-led 5YR</p> <ul style="list-style-type: none"> Support as it reflects national role. Support as it fulfils Future Wales. Minority view that only this option would reflect the status of Newport as part of the National Growth Area. While most accept 1, 2, and 3 as viable options. <p>Growth Option 2 WG-2018-HIGHPOP</p> <ul style="list-style-type: none"> Support as it is rebased on 2021 census, using 2018 projections and findings of the 2021 Census. Further uplift based on recent fertility, mortality, and migration trends. <p>Growth Option 3 Dwelling-led 10YR</p> <ul style="list-style-type: none"> Support on the basis that it provides a longer term view of historic trends, smoothing out peaks and troughs in the levels of development activity. <p>Growth Option 4 WG-2018-Principal</p> <ul style="list-style-type: none"> Opposition as it is not rebased on 2021 census, using 2018 projections. <p>Growth Option 5 PG-Long Term</p> <ul style="list-style-type: none"> Opposition as growth hasn’t been uplifted based on recent fertility, mortality, and migration trends. <p>Growth Option 6 Employment-led OE+D&I Uplift</p> <ul style="list-style-type: none"> Opposition as growth hasn’t been uplifted based on recent fertility, mortality, and migration trends.

Community Councils	<ul style="list-style-type: none"> Concerns regarding development on Levels and St Brides and Peterstone. 	
Neighbouring Authorities	<ul style="list-style-type: none"> Consideration should be given to potential need to relook at scenarios subject to 2021 census. Need for understanding general regional picture. 	
General Consultation Bodies	<ul style="list-style-type: none"> Some support for two lowest options as least damaging on biodiversity and climate change. Others have given no specific comments other than confirming that growth should be determined in line with the environmental capacity of the plan area to accommodate the growth. Minority view that no support should be given to any options due to the above impact. Continue delivering a steady and adequate supply of raw materials, and ensuring infrastructure is safeguarded. To ensure growth and deliver high quality homes. 	
Other (including Members of the public, unspecified organisations and political representatives)	<ul style="list-style-type: none"> Evidence of parallel with current LDP supporting a high housing led growth strategy with a growing deprivation in Newport as a whole. Support for disregarding lowest options. Some support of highest level of growth will need to be set in order to meet the Vision and fulfil the strategic aspirations for Newport as a Gateway City to Wales. Mixed views on where outskirt development should and shouldn't be. Mixed views on whether only brownfield sites or a combination of brownfield and greenfield sites should be considered. Support for the aim of reopening Caerleon Railway Station. Population led but needs to be higher. Employment led is not appropriate due to the transient role of the city. 	<p>Growth Option 1 Dwelling-led 5YR</p> <ul style="list-style-type: none"> Support as the main option to focus on due to being able to fulfil Future Wales and reflects national role. <p>Growth Option 2 WG-2018-HIGHPOP</p> <ul style="list-style-type: none"> Most likely to achieve sustainable growth over the whole plan period and, appears at this stage of analysis, to imply the most positive outcomes and the least negative outcomes. <p>Growth Option 3 Dwelling-led 10YR</p> <ul style="list-style-type: none"> Minor support due to it having the most positive responses to the objectives set, but understood that the downside would be fewer housing completions and potentially less employment opportunities.

Four spatial options were consulted on, these were:

- Previously Developed Land (PDL) Led:** A PDL led approach would constitute a continuation of the current spatial strategy, focusing growth on previously developed land. It would require high density development within the urban boundary and would need to explore the reuse of declining employment or industrial land for either housing or new types of employment uses. Under this option the use of greenfield land should be avoided as far as possible.
- Urban Extension:** the identification of land on the edge of the urban boundary. This is likely to constitute a substantial amount of greenfield growth and it is unclear whether land-based constraints would restrict the scale of growth.
- Village Focus:** direct housing development towards the nine defined villages of Castleton and Marshfield; St Brides; Bishton; Llanwern; Underwood; Llanvaches; Parc Seymour and Christchurch. Some villages are more constrained than others and as a result less constrained villages would support a high proportion of growth under this scenario. Directing development towards villages alone is likely to result in a high amount of greenfield land consumption and is unlikely to support a higher scale of growth due to land availability and the level of existing services and facilities.
- Hybrid Approach:** include a mix of previously developed land, sites on the edge of the urban boundary and sites at and surrounding existing villages. This strategy would be able to draw upon the spatial benefits of the other options, but it could be difficult to balance growth across this option.

Table 3 provides a summary of comments received. From these, broad conclusions can be drawn that a mixed approach of directing development towards Previously Developed Land (PDL), the edge of the urban area and small development at some villages is the most appropriate. Although the principle of maximising the redevelopment of PDL was supported, concerns were raised around relying on these sites, particularly smaller sites for the delivery of new homes as the number of readily available PDL sites is reducing. There is encouragement for the protection of the Gwent Levels and rural communities located within the area. A village focus is discouraged, with some concerns raised regarding the services and facilities of rural communities under this scenario. Concern over the risk of coalescence between the urban area and villages under an urban expansion led scenario were also raised.

Table 3: Summary of Comments Received on Spatial Options		
Stakeholder type	General Comments on Spatial Strategy	Comments on Options
Statutory Bodies	<ul style="list-style-type: none"> Development could be affected by flooding from the sea, rivers, and areas prone to surface water flooding. Potential for development in areas that have the potential for wildfires. Sites should be near existing or planning water infrastructure services where possible. Hydraulic modelling may need to be conducted. Consideration for development in relation to National Grid, Flood Risk, Protected Species, and Protected sites. Utilising active travel more, accessibility / connectivity to public transport, air quality management, and more community connectedness. 	<p>Urban Expansion</p> <ul style="list-style-type: none"> Potential for undue pressure on the preservation of historic assets within the countryside due to the high levels of growth required. <p>Village Growth</p> <ul style="list-style-type: none"> Any village focus will need to take into consideration the need for respective wastewater treatment works to have the capacity or potential capacity to deal with the prospective growth.
Agent / Developers / Landowners	<ul style="list-style-type: none"> Some developers believe that a “new settlement” should be considered. With the area around St Brides, being identified by a developer for a new village. Minority of developers think that the lack of the long list of candidate sites being public limits the ability of the general public to assess and scrutinise the sites and the council decisions. Consideration for impact of updated TAN 15. Criticism of “traffic light” approach. 	<p>Previously Developed Land</p> <ul style="list-style-type: none"> Mixed views on whether PDL-led approach is the best. Some view PDL-led approach will not be possible as there is not enough PDL land to implement it. Some view that PDL-led development is utilising land the best and is a natural continuation of the previous LDP. Majority view though that PDL allocations in the adopted LDP where development has not commenced should continue to be supported through a positive allocation but should not be relied upon to meet the housing requirement. Majority view that no PDL allocations should be made on sites with capacity for less than 50 homes. These should be allowed to come forward as windfall sites Majority view that new PDL allocations in excess of 50 homes that are counted towards meeting the housing requirement should only be made where it has been demonstrated that these are viable. <p>Urban Expansion</p> <ul style="list-style-type: none"> Majority of developers view that while there should be a hybrid approach, it should be with an urban expansion focus. This urban expansion should be sustainable in nature (following “Building Better Places” principle). Expanding Llanwern, Langstone, and Bettws being an example of this, High Cross, Rhiwderin, Pentrepoeth, Rogerstone, and Newport Golf Club to a lesser extent. Minority of developers think that it should be an urban expansion only. <p>Village Growth</p> <ul style="list-style-type: none"> Minority of developers think Village led approach would be preferable. Castleton and Marshfield being most preferred due to have the most services currently. Christchurch to a lesser extent. <p>Hybrid</p> <ul style="list-style-type: none"> Majority developers view that a hybrid approach of all three is the most pragmatic. Mix of urban and rural land use for development. A smaller developer wants a scattered growth option, many smaller sites around the City. A small developer sees that the hybrid option is low risk and can help deliver a balanced supply along with a balanced distribution.
Community Councils	<ul style="list-style-type: none"> Marshfield Community Council concerned with many current spatial issues in Marshfield, considers Marshfield as an unsustainable area and any more development that isn't a net increase in services, amenities, and infrastructure would be resisted. 	<p>Previously Developed Land</p> <ul style="list-style-type: none"> Marshfield Community Council would prefer development on brownfield sites. <p>Urban Expansion</p> <ul style="list-style-type: none"> Green wedge protection needed between the proposed new train station at St Mellons and Marshfield. <p>Village Growth</p> <ul style="list-style-type: none"> Suggestion of prohibiting granting of planning consent for new builds in areas where the community has been categorised as “unsustainable.” Some community councils against the idea of Peterstone and St Brides being developed.
Neighbouring Authorities	<ul style="list-style-type: none"> Torfaen Council considers that there is a lack of information on specific candidate sites and as such cannot comment. 	<p>PDL-Led</p> <ul style="list-style-type: none"> Support for maximising development of PDL. <p>Hybrid</p> <ul style="list-style-type: none"> Hybrid approach is the most appropriate, focusing on PDL and village focus.

<p>General Consultation Bodies</p>	<ul style="list-style-type: none"> • Green growth should be the focus and this should be in harmony with tackling the diversity and Climate Change crisis. • Supporting spatial options that can be served effectively by public transport, this is more difficult if developed away from proposed or current public transport options. • “New settlement” is a worthy consideration. • Lack of the long list of candidate sites being public limits the ability of the general public to assess and scrutinise the sites and the council decisions. 	<p>PDL-Led</p> <ul style="list-style-type: none"> • PDL-led approach will not be possible as there is not enough PDL land to implement it. <p>Hybrid</p> <ul style="list-style-type: none"> • Scattered growth option supported, many smaller sites around the City.
<p>Other (including Members of the public, unspecified organisations and political representatives)</p>	<ul style="list-style-type: none"> • A lot of support for protection of Gwent Levels. • Sites to include more circular footpaths and cycle paths around the periphery of any new estates. • Disappointed at the previous removal of 5-6 village boundaries that are included in the current urban boundary. • Indicated some interest for self-build plots in some of the villages in the City. • Support from the public that any spatial options should consider a prospective Caerleon train station as part of any future development. • Concerns Climate change is going to have a major impact on development in the City of Newport. 	<p>PDL-Led</p> <ul style="list-style-type: none"> • Strong support for the continuation of the PDL-led approach. • Some understanding that PDL-led approach may be limited. • PDL is considered most appropriate by most of the public. Especially to avoid village focus. <p>Urban Expansion</p> <ul style="list-style-type: none"> • Coalescence of villages and the city of Newport should be avoided. <p>Village Growth</p> <ul style="list-style-type: none"> • Some outright objection to village focus. • Langstone needs a local or district centre. With services and amenities such as a small market, doctor’s surgery, barbers, and more things for children and new families including a school. • The Gorelands and Catsash Road area would be perfect for a new school. • Rogerstone, Rhiwderin, and Bassaleg areas are considered to be not preferable due to lack of services and with general overdevelopment in the area over the years. • Biodiversity should be maintained and all non-statutory and statutory habitat sites protected. <p>Not enough services and amenities in Penhow or other villages (most if not all are volunteer run).</p> <p>Hybrid</p> <ul style="list-style-type: none"> • Some acceptance that a hybrid approach will be needed, but that it should be sustainable development. PDL alone is not practical, therefore some urban expansion and village settlement growth will need to be a part of it. • Important to address tenure and dwelling type and mix, placemaking, and the role of community engagement and community led housing development. • Some members of the public consider a hybrid approach of all three being the most pragmatic. With repurposing more city centre sites for housing to have an eclectic mix of living and business / commercial. • Transport issues being the key part to decision making if commuting by car is not to increase.

The engagement events undertaken by Planning Aid Wales (PAW) gave the opportunity for attendees to learn about the RLDP process, specifically the Growth and Spatial Options. Across ten events, comprising both in person and online formats, 135 stakeholders participated in these events. The feedback received focused on the Growth Options, Employment Land and Spatial Options presented in the published consultation paper.

Many useful comments were made and have informed the recommendations to Cabinet e.g. general acceptance that Newport needs to grow, recognised need for housing and employment land whilst balancing environmental and infrastructure constraints at the same time, no objection to the shortlist of growth scenarios and the objectives to test them against, no disagreement with the proposed employment land to take forward, questioned whether employment needs could be met with regeneration of the city centre, hybrid spatial option considered most appropriate by the majority but there was also significant support for the PDL option, no alternative spatial options recommended, both the growth and spatial options presented needed more detailed testing moving forward. Detailed notes were taken at each event to collate the key issues raised, and these will be considered where relevant in the preparation of the RLDP. PAW has provided a report outlining the events and feedback received, a summary is also provided. These can be viewed in Appendix A of this report.

Next Steps

The next formal stage of preparing the Replacement Local Development Plan is to publish a Preferred Strategy. This outlines the housing and job growth requirements that the Local Development Plan will seek to achieve. To reach this stage, the Council has undertaken more than two years of evidence gathering and undertaken two informal consultations on key aspects of the Local Development Plan in the Vision, Issues and Objectives and the Growth and Spatial Strategies. The full Preferred Strategy Consultation Paper can be found in Appendix B.

The following table outlines the background documents that inform and support the Preferred Strategy (available using hyperlinks below):

Table 4: Background Papers
Regional Evidence Base Documents
Larger than Local Employment Study, BE Group, April 2020
Regional SFCA Stage 1 Report, JBA, November 2022
Regional Renewable and Low Carbon Energy Report, Carbon Trust, December 2020
Local Evidence Base Documents
Other Documents for Consultation
Candidate Sites Register
Initial Integrated Sustainability Appraisal Report
Habitats Regulations Assessment Screening Report
Technical Evidence Base Documents
Demographic Study, Edge Analytics, September 2022
Employment Land Review, BE Group, February 2022
Retail and Leisure Study 2019, Nexus, July 2019
Retail and Leisure Study Addendum, Nexus, July 2023
Urban Capacity Study, Lambert Hampton Smith, April 2022
Housing Supply Review, Lambert Hampton Smith, April 2022
Newport Renewable and Low Carbon Energy Report, Carbon Trust, December 2020
Green Infrastructure Assessment, CBA, February 2022
Newport Limestone Aggregate Resource Assessment, June 2023
Topic Based Background Papers
Candidate Site Assessment Report
Employment Land Background Paper
Spatial Strategy and Urban Boundary Review
Formulating the Growth Strategy
Settlement Assessment (Village Appraisal)
Housing Supply Background Paper
Retail and Leisure Background Paper
Health Background Paper
Climate Change Background Paper
Waste Background Paper
Transport Background Paper
Minerals Background Paper
Renewable Energy Background Paper
Flood Risk Background Paper
Historic Environment Background Paper
Green Infrastructure and Biodiversity Background Paper
Issues, Vision and Objectives Background Paper
Community Facilities and Planning Obligations Background Paper

To formally progress a Preferred Strategy another stage of consultation is required. The consultation on this must be legally compliant and the process is set out within Regulations 15 and 16 of The Town and Country Planning (Local Development Plan) (Wales) Regulations 2005 (as amended). The Regulations stipulate that the consultation documents must be made available online at the Council's principal office and any other locations as the Local Planning Authority deem appropriate; provide a statement of fact outlining which documents are available for inspection and the place and times they can be inspected; representations can be made by anyone and must be sent to the address outlined in the statement of fact;

consultation must last at least 6 weeks; and representations received must be considered before finally determining the content of the Deposit Plan.

Contents of the Preferred Strategy

In summary, the Preferred Strategy document for consultation (found in Appendix B) indicates the overarching strategy for 9,570 new homes and 8,640 new jobs to achieve the Vision of Newport as a destination where people want to live, work and visit. These are to be delivered on a mix of previously developed land and greenfield sites within and adjoining the main settlement, with some, smaller scale development occurring at villages with defined limits of development (settlement boundaries). This approach promotes the reuse and redevelopment of previously developed land, new growth in appropriate locations and new development in more rural locations to sustain local communities. The plan-led planning system requires the identification of development sites to deliver the strategy. Key sites have been distinguished from the Candidate Sites, submitted to the Council by proposers in August 2021. These are sites over a 300 dwelling threshold and strategic employment sites. This threshold has been used as it is these sites which are likely to make the biggest contribution to delivering placemaking objectives.

The Preferred Strategy responds and addresses the national, regional and local context; economic, environmental, social and cultural issues; the RLDP vision; and RLDP objectives set out within chapters 2, 3, 4 and 5. The delivery of the Preferred Strategy is underpinned by a number of strategic policies, the delivery of the associated objectives and subsequent aims of these will be supported by development management policies and associated Supplementary Planning Guidance. Draft strategic policies are set out within Chapter 8, while the extent of proposed changes to development management policies are set out within Chapter 9.

In line with the Council's Delivery Agreement for the Replacement Local Development Plan, the Preferred Strategy consultation will include the publication of the Initial Integrated Sustainability Appraisal (ISA) Report and the Habitats Regulation Assessment Screening Report. These are available using the hyperlinks in Table 4 above. These are important documents, required by legislation, which assess the impacts of Local Development Plan proposals on a range of factors to ensure that no significant adverse effects arise on either the ISA objectives set out with the ISA Framework or on designated sites under the Habitats Regulations. The Council is obligated to accept any additional Candidate Sites submitted during the Preferred Strategy consultation, as such the Call for Candidate Sites will be reopened and associated guidance updated to inform this process.

Financial Summary (Capital and Revenue)

The RLDP process has a project specific budget to cover costs of all resources associated, including additional staff, consultations, commissions, examination processes etc. The resources required for the RLDP process are set out in the Delivery Agreement. The table below sets out an estimated cost for the RLDP which has been based on the previous LDP and neighbouring authority costs. The table identifies a potential residual sum remaining at the end of RLDP process, however it should be noted that the estimates used are on the cautious side. There are some implications to the budget as a result of extending the timeline of delivery to early 2026. Underspend during the previous year (Year 2) relates to project delays and less than anticipated expenditure on staff, resulting from the team not being at full capacity since the RLDP process began. An accurate cost has been identified under the current year and a fifth year has been forecast. These indicate that the delay can be managed within the project budget. We will continue to monitor and mitigate as the plan review progresses.

	Year 1 (Start RLDP 2021/22) Actual £	Year 2 2022/23 Actual £	Year 3 2023/24 £	Year 4 2024/25 £	Year 5 2025/26 £	Notes including budgets heads affected
Staff Costs	63,270	43,934	72,518	75,000	75,000	
Other Costs	126,292	- 2,126	94,086	225,000	180,000	

Funded by:						Costs include estimated additional staff resource on fixed term contracts which will need to be subject to a business case.
Revenue	71,604	71,604	71,604	71,604	71,604	
Budget						
LDP						
Reserve	117,958	0	95,000	228,396	183,396	
Net Costs	0	0	0	0	0	
(Savings)	(0)	(29,796)	(0)	(0)	(0)	
Net Impact on Budget	0	0	0	0	0	
LDP Reserve (£544,354 2023/24)	514,558	544,354	449,354	220,958	37,562	

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 endorsing the responses to GSO consultation representations	L	L	The Council has committed to the RLDP process, which includes the Growth and Spatial Strategy. This is the second LDP for Newport and the process is established and understood. It is unlikely that not approving the recommended responses would result in a delay at this stage.	Planning Policy Manager
Not approving the Preferred Strategy for formal consultation	H	L	Consultation on the Preferred Strategy is a formal, statutory stage of plan preparation stipulated by the Town and Country Planning Regulations 2005, as amended. This is essential for building consensus around the growth strategy prior to the publication of a Deposit Plan. The RLDP project is currently running in accordance with the revised Delivery Agreement and not approving the Preferred Strategy could result in slippage against this timetable and further delays to the project overall.	Planning Policy Manager

Links to Council Policies and Priorities

The Local Development Plan is one of the statutory plans the Council has to prepare. The current LDP determines Newport's land use policies to 2026. The LDP covers many topics that impact on other sections of the Council e.g. drainage, tourism, education etc. The Preferred Strategy provides a chapter on national, regional and local context. This section outlines the Council's policies, strategies and priorities, bringing up to date and building upon on the RLDP Review Report published in 2021. In summary, 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 RLDP, particularly the Corporate Plan and the Organisational Climate Change Plan. The primary objective of the Corporate Plan is '*a fairer, greener, ambitious Newport for everyone*' 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 principles: Fair and Inclusive; Empowering; A listening council; and Citizen Focussed 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 Management Plan, Destination Management Strategy, Economic Growth Plan. A full appraisal of council plans and strategies can be found in Chapter 2 and Appendix 5 of the Preferred Strategy paper and indicated how the Preferred Strategy, particularly the issues, vision and objectives, was informed by current Council policies and priorities.

Options Available and Considered

- 1) Cabinet notes the GSO consultation comments received, endorses the recommended Council responses and recommends that Council approve the Preferred Strategy for consultation.
- 2) Cabinet notes the GSO consultation comments received and provides amendments to the recommended Council response and / or the Preferred Strategy prior to consideration by Council.
- 3) Cabinet notes the GSO consultation comments received and does not endorse the recommended responses and / or recommend Council's approval of the Preferred Strategy for consultation.

Preferred Option and Why

1. For Cabinet to note the GSO consultation comments received, endorse the recommended Council responses and recommend that Council approve the Preferred Strategy for consultation. Consultation on the Preferred Strategy is a formal stage of plan preparation stipulated by the Town and Country Planning Regulations 2005, as amended. This is essential for building consensus around the growth strategy prior to the publication of a Deposit Plan.

Comments of Chief Financial Officer

The report seeks Cabinet approval for the Replacement Local Development Plan (RLDP) Preferred Strategy. The finance table maps out the costs and funding implications for the current and following 2 years.

The report sets out the overall objectives, strategies and key issues for the RLDP. It is essential that the RLDP continues to align with the Council's strategies and priorities, financial objectives, available resources and service requirements.

Currently there are no direct un-afforded financial implications arising from this report with existing budgets and sufficient reserve cover deemed sufficient to meet the current financial implications of undertaking consultation on the Preferred Strategy and preparing the Deposit Plan.

The costs of facilitating the actual RLDP implementation are not considered here, and any significant costs involved would need to be considered as part of future budget setting plans.

Comments of Monitoring Officer

The Council as Local Planning Authority (LPA) has a statutory duty to produce a Local Development Plan (LDP). The LPA's statutory duties under the LDP system are contained within Part 6 of the Planning and Compulsory Purchase Act 2004. The LPA is required under Section 69 of the Planning and Compulsory Purchase Act 2004 to undertake a full review of the adopted LDP at intervals not longer than every 4 years from the date of adoption. The Replacement Local Development Plan (RLDP) has to be prepared in accordance with the Town and Country Planning (Local Development Plan) (Wales) Regulations 2005 (as amended). There is a formal process to follow and this is described within the body of this Report. The Regulations must be adhered to at each stage so as to avoid the risk of a challenge to the Council's process.

This report confirms that officers have progressed to the Preferred Strategy stage and are now seeking approval to begin public consultation on that document, in accordance Regulations 15 and 16 and with the timetable contained in the Delivery Agreement (required by Regulation 9), which has previously been approved.

Comments of Head of People Policy and Transformation

This report sets out the draft Preferred Strategy for formal public consultation, which will inform the preparation of the draft Replacement Local Development Plan (RLDP) and outlines the housing and job growth requirements that the LDP seeks to achieve. Undertaking a statutory consultation on a Preferred Strategy follows a number of other formal stages over the last two years including informal engagement on the growth and spatial options. The preferred option recommends that Council approve the draft Preferred Strategy for formal consultation to take place later this year.

The draft Preferred Strategy was informed by engaging a range of communities including statutory bodies, agent/developers/landowners, community councils, neighbouring authorities, and members of the public through two informal consultations on the draft Vision, Issues and Objectives (early 2022) and the Growth and Spatial Options (early 2023).

A Fairness and Equalities Impact Assessment (FEIA) was not undertaken for this specific piece of work as the RLDP process incorporates an FEIA within its Integrated Sustainability Appraisal (ISA), with an initial ISA report included as part of the consultation on the Preferred Strategy. The strategy is clearly aligned to the principles of the Well Being of Future Generations Act.

Scrutiny Committee

To be verbally reported.

Fairness and Equality Impact Assessment:

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

As part of the RLDP work an Integrated Sustainability Appraisal is undertaken. This fulfils the requirements and duties for:

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

The aim of the ISA is to inform and influence the plan-making process with a view to avoiding and mitigating negative impacts and maximising positive impacts. By undertaking this process, the Council can be confident that the RLDP will be prepared in a manner which clearly considers its impact on these aspects

of fairness and equality. The engagement at each stage is undertaken in line with the agreed Community Involvement Scheme (set out in the approved Delivery Agreement) as approved by Full Council and Welsh Government.

An FEIA has not been undertaken for this specific piece of work as the RLDP process incorporates an FEIA within its ISA process. In terms of the Well-being and Future Generations Act, there is a specific 'health and wellbeing' objective. Every policy/site introduced by the RLDP will need to consider how it will improve the health and wellbeing of residents within Newport and there are five more detailed questions that will need to be addressed.

Similarly with the Equality Act, socio-economic duty and Welsh language measures, the Vision, Issues and Objectives as informed by the ISA framework includes an objective entitled 'Equality, diversity and inclusion'. The objectives are explicit about the role of the plan in achieving this.

In summary, the RLDP has a system of Integrated Sustainability Appraisal work that will go beyond that of an FEIA. Consequently, it is not considered necessary to undertake an FEIA in relation to this specific report.

Crime and Disorder Act 1998

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

Consultation

The Preferred Strategy, including supporting documentation, will be consulted on in late 2023, subject to Cabinet endorsement and Council Approval. The consultation process will take a minimum of 6 weeks and responses will be fed back to Cabinet in September 2024 where endorsement of the Council's response and approval of a Deposit Plan for publication will be sought.

Background Papers

As outlined in the Report (see Table 4).

Dated: September 2023

**Appendix A – Growth and Spatial Options Consultation Representations and Response
(including an engagement report from Planning Aid Wales)**

Appendix B – Preferred Strategy (including an Easy Read version)

Local Development Framework

Growth and Spatial Options Consultation

The below comments are published in accordance with Newport City Council's [Planning Policy Privacy Notice](#).

Please note that 68 individual responses were received in total (reps 012 and 040 were submitted in duplicate).

GSO 001 - Gwent Ornithological Society - 00389

Question / Response	Officer Response
GROWTH OPTIONS: Growth Scenarios - 1. Are there any scenarios that have been discounted which should be considered further, and why? 2. Which of the options do you feel is the most appropriate, and why? Assessment of Growth Options Against RLDP Objectives - 3. Are there any other matters that should be taken account of when assessing these scenarios and identifying a Preferred Strategy?	
1. No 2. 5. PG-Long Term or 6. Employment-led OE+D&I Uplift I favour these two options as they are least damaging for biodiversity and climate change. Green growth should be Newport's main focus and this should be in harmony with tackling the biodiversity and Climate Change crises.	Noted Noted. The Growth Option taken forward is discussed in detail in the Preferred Strategy Cabinet Paper, the Preferred Strategy Consultation Paper and associated Background Papers.
3. No	Noted
Employment Land Review Recommendation One - 4. Is this requirement appropriate for Newport? 5. Should it be different and if so, why? Recommendation Two - 6. Should some sites be removed from the employment supply? Why? 7. Should alternative land uses be considered for some sites? Please provide examples of such uses and your rationale for this.	
4,5,6,7 No Opinion	Noted
SPATIAL OPTIONS: 8. Which of these options do you feel is the most appropriate, and why? 9. Are there any other spatial distributions that should be considered, and if so, why? 10. Are there any other matters that should be given consideration when assessing these?	
8. PDL led or hybrid	Noted. The Spatial Option taken forward is discussed in detail in the Preferred Strategy Cabinet Paper, the Preferred

<p>I favour these two options as they are least damaging for biodiversity and climate change. Green growth should be Newport's main focus and this should be in harmony with tackling the biodiversity and Climate Change crises.</p> <p>9 No</p> <p>11. No opinion</p>	<p>Strategy Consultation Paper and associated Background Papers.</p> <p>Noted</p> <p>Noted</p>
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GSO 002 - Fire And Rescue Service - 00137

Question / Response	Officer Response
<p>Changes to our climate and weather patterns will have a significant impact on the well-being of both current and future generations. In line with the Well-being of Future Generations (Wales) Act 2015 and the Future Wales - the national plan 2040 framework document, the following areas should be considered early in any planning process:</p> <p>The climate emergency is likely to increase the risk of flooding as a result of sea-level rises, more frequent severe weather systems and more intense rainfall. Planning authorities should adopt a precautionary approach of positive avoidance of building developments in areas of flooding from the sea or from rivers. Surface water flooding will affect the choice of location and the layout and design of schemes and these factors should be considered at an early stage in formulating any development proposals.</p> <p>Wildfires are a significant potential threat particularly in populated areas adjoining green spaces such as mountains or forestry. Therefore, it is critical that new developments are designed with this in mind. Where a new development is proposed in an area which is at risk of a wildfire, consideration should be given on how to mitigate the spread of wildfires. For example, sustainable land management could assist with prevention measures.</p>	<p>Section 5 of the G&SO indicates spatial distribution options and assessed these at a high level in relation to their contribution to the emerging objectives of the plan, including:</p> <p><i>“Climate Change - To ensure that development and land uses in Newport are resilient to the effects of climate change, and actively tackle the causes and impacts of climate change through minimisation, adaptation and mitigation.”</i></p> <p>The issues of climate change, flooding and sustainable land management will be considered in further detail as the plan progresses.</p>

GSO 003 - Dafydd Williams – 00844

Question / Response	Officer Response
<p>After attending the last meeting at which there were no representatives of my local planning department nor any local councillors present to answer any questions that the public had I do not wish to attend any more of these meetings as I do not want to give this tick box exercise any air of legitimacy that it so obviously doesn't deserve.</p>	<p>Noted.</p>

GSO 004 - Michael Sugrue - 00464

Question / Response	Officer Response
<p>I would like the city council adopt a policy whereby all new housing developments must include a circular footpath and cycle path around the periphery of the estate.</p> <p>For existing estates, with no circular route, I would like to see better signage to guide casual walkers/cyclists to find their way through housing estates as a means of encouraging more local people to take exercise.</p> <p>Last summer my wife and I tried to walk from Hindering to Rogerstone Welfare and then through Jubilee Park housing estate and returning via Bassaleg. Parts of Jubilee park were enjoyable with a wide path suitable to walkers and cyclists but on other parts we were obliged to walk along estate roads only to find that they were fenced off from the path and we were forced to retrace and look for an alternative route. This was time consuming and frustrating.</p> <p>I appreciate that the cost of signage might be an issue in the current economic climate but having such routes available via the neport.gov.uk website would be a suitable solution as it would allow walks to be planned in advance.</p> <p>I am aware that you have published some leaflets that include walks for Wetlands etc but I would like to see something similar which might be called Urban Walks or Semi-Rural walks.</p>	<p>Section 5 of the G&SO indicates spatial distribution options and assessed these at a high level in relation to their contribution to the emerging objectives of the plan, including:</p> <p>“Transport and Movement - Reduce the need to travel and increase the use and provision of sustainable travel options.”</p> <p>Consideration will be given to these points once we progress to the policy drafting stage. It should be noted that the role of the plan is not to designate existing footpaths, but to be the framework to support such development proposals in appropriate locations.</p>

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GSO 005 - Guy Lewis - 00845

Question / Response	Officer Response
<p>I live in Langstone and feel that it lacks community feel. It needs a centre. I mini market where fresh vegetables can be bought. I doctor's surgery, barbers etc. it has grown quite a bit over the 48 years I have lived here.</p> <p>The Gorelands and Catsash road area could be the perfect area and might have room for a new school which at the moment is far too small to accommodate children in the village. The old school could be a great area to develop for houses and a new school either on the Gorelands land or land on the Magor road near the Crematory.</p> <p>But Langstone lacks amenities. It has lots of hotels, but nothing for children and new families. Hillcroft garage is currently the only place to get a bottle of expensive milk. More amenities are required.</p>	<p>Consideration will be given to these points once we progress to the policy drafting stage. It should be noted that the role of the plan is not to deliver such facilities, but to be the framework to support such development proposals in appropriate locations.</p>

Question / Response	Officer Response
<p>I recently attended the open meeting regarding the next phase of domestic property building at Rhiwderin that covered the Bassaleg and Rogerstone area (hereafter referred to as R.B &R). I would like to limit comments to the Rogerstone area but there will be some crossover with the other areas. I would like my comments to be included on any further planning applications that the council considers under the LDP Consultation</p> <p>Over many years the Rogerstone area has become saturated with new housing developments. It has become a 'village' in name only but now resembles a large suburb of the city.</p> <p>In my memory, below is a list of developments that have taken place, there could of course be others that I have forgotten</p> <ul style="list-style-type: none"> • 'Court Gardens' - local to the vicarage roundabout • R/H side of Pontymason Lane - heading towards Risca leisure center 'Great Oaks' entrance opposite Bethesda church • 'Bethesda Place' opposite the Tredegar Arms public house • Mountplaesant / old Asda estate • Jubilee Park old Alcan site • Afon Village old Power Station site • Badgers Walk old Alcan playing fields <p>Please excuse my memory if some of the estate names are incorrect but the location should assist you with the correct names to identify them.</p> <p>As with each property on average it contains 4 people, 2 adults and 2 children if statistics are to be believed.</p> <p>So any new property built will have a knock on effect to the local Health, Education and other Council run services. The pressure on local Ambulance services has had a dramatic effect with X waiting 8hrs while on the floor with a broken ankle after a fall and a motorcyclist waiting 3 hrs after a RTA.</p> <p>The addition of extra housing will only increase pressure on an already overstretched resources. Each property will also increase the amount of traffic that local roads will have to absorb (normally 2 vehicles per household). At present the local roads are frequently gridlocked with Forge Lane and the B4591 Cefn Road particularly effected as they a routs to the M4 motorway. Along with the congestion</p>	<p>Noted. The Spatial Option taken forward is discussed in detail in the Preferred Strategy Cabinet Paper, the Preferred Strategy Consultation Paper and associated Background paper.</p>

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<p>comes extra pollution from vehicles that are stuck in 'traffic jams'. This situation has not been helped by the Welsh Assembly cancelling all new road building projects.</p> <p>Also as Newport is a Gateway to the M4, the local road network of R.B&R has to cope with extra traffic from the other local areas of Caerphilly and Torfaen.</p> <p>So in summing up I do not think the area of R.B&R should be considered viable for any further domestic property building in the next round of land procurement due to the detrimental effect on local services and roads.</p>	
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GSO 007 - Dwr Cymru Welsh Water - 00013

Question / Response	Officer Response
<p>GROWTH OPTIONS: Growth Scenarios - 1. Are there any scenarios that have been discounted which should be considered further, and why? 2. Which of the options do you feel is the most appropriate, and why? Assessment of Growth Options Against RLDP Objectives - 3. Are there any other matters that should be taken account of when assessing these scenarios and identifying a Preferred Strategy?</p>	
<p>Welsh Water has no real preference regarding the options being considered for the number of new homes to be provided through the Newport Replacement LDP. As a provider of water and sewerage infrastructure in the County we are primarily governed by the Water Industry Act 1991 (as amended) whereby we have a duty to extend and improve our assets to accommodate growth. We aim to ensure that sufficient infrastructure exists for domestic development, and we seek to address deficiencies through capital investment in our 5-year Asset Management Plans (AMP). We must put forward a business plan for investment for each AMP cycle, and as part of this work we require some certainty in terms of growth areas and site development proposals. An adopted Local Development Plan with allocated growth helps strengthen the case Welsh Water can put forward to our regulator Ofwat in relation to projects requiring AMP funding.</p>	Noted
<p>SPATIAL OPTIONS: 8. Which of these options do you feel is the most appropriate, and why? 9. Are there any other spatial distributions that should considered, and if so, why? 10. Are there any other matters that should be given consideration when assessing these?</p>	

The impact on our infrastructure will be dependent on the amount of growth and its spatial distribution. In terms of the spatial growth options under consideration we consider that development should be located so that it can be well serviced by existing or planned infrastructure where possible, in accordance with the requirements of Planning Policy Wales.

Wastewater Treatment Works (WwTW):

Most of the County is served by either Cardiff Bay or Nash WwTW, however some of the smaller villages are served by other WwTWs. The impact of development on our WwTWs will be dependent on the amount of growth within their catchment areas. Once further information is available regarding the breakdown of growth between settlements, we can assess the potential impact upon our assets. Where the total growth identified by proposed allocations exceeds the theoretical design capacity of the WwTWs then improvements to provide further capacity will be required during the LDP period. The 'Village Focus' option lists 9 defined villages, these are served by WwTWs of varying size, and we have listed below which WwTW catchment each of these villages falls within:

Villages listed in 'village focus'	WwTW catchment
Castleton & Marshfield	Cardiff Bay
St Brides	St Brides Wentlooge
Bishton	Nash
Llanwern	Nash
Underwood	Nash
Llanvaches	Nash
Parc Seymor	Nash
Christchurch	Christchurch
Caerleon	Nash

Water supply and sewerage infrastructure

Once sites are identified we will be able to determine whether there is sufficient capacity within the water and sewerage networks to accommodate the growth proposed. Hydraulic modelling assessments may be required to determine an adequate point of connection to the water network and/or public sewer, particularly for strategic development sites, and developers would be expected to fund investigations during pre-planning stages. The findings of a hydraulic modelling assessment would identify the extent of any necessary reinforcement to the network which can be acquired through the requisition provisions of the Water Industry Act 1991 (as amended).

Noted, we will continue to liaise with relevant stakeholders on these matters as the plan progresses.

OTHER COMMENTS:

We are currently delivering the AMP7 programme which covers our capital investment for the period 2020-25, this will be followed by AMP8 for 2025-2030, and AMP9 for 2030-35. The Newport Replacement LDP has a timeframe that runs until 2036 therefore any infrastructure investment required

Noted, we will continue to liaise with relevant stakeholders on these matters as the plan progresses.

<p>can be considered for delivery in future AMPs. Where specific infrastructure improvements are required to allow a development site to proceed, but where there are no current plans to invest through the AMP, there are provisions available for developers to make financial contributions, via planning obligations under the provisions of S106 Town & Country Planning Act 1990, to secure the necessary improvements. At this early stage of the LDP process, without knowing the level of growth in each settlement and the specific location of proposed development sites, we will not be able to accurately assess the capability of WwTWs and the existing sewerage and water network to accommodate proposed growth. Once further information is available, we would be pleased to work with the LPA to undertake the necessary assessments.</p>	
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GSO 008 - Matthew Bevington - 00775

Question / Response	Officer Response
<p>GROWTH OPTIONS: Growth Scenarios - 1. Are there any scenarios that have been discounted which should be considered further, and why? 2. Which of the options do you feel is the most appropriate, and why? Assessment of Growth Options Against RLDP Objectives - 3. Are there any other matters that should be taken account of when assessing these scenarios and identifying a Preferred Strategy?</p>	
<p>1. The options presented do not include a scenario that represents growth during recessions. Economic forecasts indicate a likely recession over the next several years. Scenarios that represent similar growth in the years around the 2008 economic conditions may be more relevant. 2. I believe growth will be lower due to forecasted economic conditions. Therefore Options 5 and 6 may be the most likely outcome. 3. N/A</p>	<p>The Demographic Evidence considered unemployment rates and recession using Data from ONS since 2004. Noted Noted</p>
<p>EMPLOYMENT LAND OPTIONS: Recommendation One - 4. Is this requirement appropriate for Newport? 5. Should it be different and if so, why? Recommendation Two - 6. Should some sites be removed from the employment supply? Why? 7. Should alternative land uses be considered for some sites? Please provide examples of such uses and your rationale for this.</p>	
<p>4. It appears the number of 77ha has not considered already existing vacant employment areas. It is nonsensical that this figure be derived independent of a review of the occupation of available employment areas.</p>	<p>The Employment Land Review (NB not executive summary) discusses this in more detail and includes “along with a review of the supply of vacant premises and enquiries data” and a Vacancy Schedule.</p>

<p>5. As above, a review of existing vacant employment land should be undertaken to derive a reliable figure.</p> <p>6. N/A</p> <p>7. N/A</p>	
<p>Spatial Options</p> <p>8. Which of these options do you feel is the most appropriate, and why?</p> <p>9. Are there any other spatial distributions that should be considered, and if so, why?</p> <p>10. Are there any other matters that should be given consideration when assessing these</p>	
<p>8. I believe the PDL Led option is the most appropriate. It is important to use brownfield sites as these are the least constrained sites. Newport has undergone rapid growth and the surrounding green areas and villages are under pressure from this growth.</p> <p>9. It is important that the coalescence of Newport City and the surrounding "Villages" is avoided. Also, the coalescence of the "Villages" with neighbouring Boroughs is avoided. Existing Green Wedges should be maintained and preferably upgraded to Green Belt status. There is a real risk in places such as my "Village" Rogerstone that any expansion towards Risca will cause one continuous conurbation. Biodiversity should be maintained and all non-statutory and statutory habitat sites protected.</p> <p>10. As above, It is important that the coalescence of Newport City and the surrounding "Villages" is avoided. Also, the coalescence of the "Villages" with neighbouring Boroughs is avoided. Existing Green Wedges should be maintained and preferably upgraded to Green Belt status. There is a real risk in places such as my "Village" Rogerstone that any expansion towards Risca will cause one continuous conurbation. Biodiversity should be maintained and all non-statutory and statutory habitat sites protected.</p>	<p>Noted. The Spatial Option taken forward is discussed in detail in the Preferred Strategy Cabinet Paper, the Preferred Strategy Consultation Paper and associated Background Papers.</p> <p>The deposit plan will include reviewed urban and village boundaries and Green Wedge designations.</p> <p>Noted</p>
<p>EVIDENCE BASE:</p> <p>11. Are there any other pieces of evidence that you believe should inform the development of the preferred growth and spatial options strategies?</p> <p>12. Are there any other comments you'd like to make regarding anything within this consultation document? Do you agree with the Objectives for the RLDP? If not, how and why do you think they should be changed?</p>	
<p>11. National and global economic forecasts should be considered when determining likely growth.</p> <p>12. The RLDP options taken forward should prioritise the preservation of Green Wedges. The RLDP should ensure that the coalescence of "village" areas does not continue. For example there is a serious risk that areas such as Rogerstone and Pontymister/Risca areas are becoming one continuous settlement. "Village" areas are under tremendous pressures from traffic, coupled with lack of amenities and suitable infrastructure. Further residential developments in these areas would exacerbate the problem. The RLDP should focus development on available brownfield sites and look to optimise existing vacant residential and industrial areas.</p>	<p>The Demographic Evidence, Employment Land Review (NB not executive summary) detail what key economic factors have been considered.</p> <p>Noted. The Spatial Option taken forward is discussed in detail in the Preferred Strategy Cabinet Paper, the Preferred Strategy Consultation Paper and associated Background Papers.</p> <p>The Deposit Plan will include reviewed urban and village boundaries and Green Wedge designations.</p>

GSO 009 - Marshfield Community Council - 00022

Question / Response	Officer Response
<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>The Deposit Plan will include reviewed urban and village boundaries and Green Wedge designations.</p>
<p><u>Transport</u> The regular bus service, rather than being improved, was removed and replaced with a DRT Service. This has had the negative effect 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>The role of the Local Development Plan is to facilitate new and improved services, but it does not directly allocate these or determine the location.</p> <p>As part of this process the LDP team will continue to work with partners, including Welsh Government and Transport for Wales, during the preparation of the replacement LDP to ensure policy reflect the opportunities identified by the appropriate transport strategies and that our development strategy seeks to support the delivery of strategic and local transport improvements.</p> <p>Comments have been passed to City Services</p>
<p><u>Flood Risk</u> 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. 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>The role of the Local Development Plan is to facilitate new and improved services, but it does not directly allocate these or determine the location.</p> <p>As part of this process the LDP team will continue to work with partners, including Welsh Government and NRW, during the preparation of the replacement LDP to ensure policy reflect the opportunities identified by the appropriate flooding strategies and that our development strategy seeks to support the delivery of strategic and local improvements.</p> <p>Comments have been passed to City Services</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>The role of the Local Development Plan is to facilitate new and improved services, but it does not directly allocate these or determine the location.</p> <p>As part of this process the LDP team will continue to work with partners, including Welsh Government and Transport for Wales, during the preparation of the replacement LDP to ensure policy reflect the opportunities identified by the appropriate transport strategies and that our development strategy seeks to support the delivery of strategic and local transport improvements.</p> <p>Comments have been passed to City Services</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>The role of the Local Development Plan is to facilitate new and improved services, but it does not directly allocate these or determine the location.</p> <p>As part of this process the LDP team will continue to work with partners, including Welsh Government and Transport for Wales, during the preparation of the replacement LDP to ensure policy reflect the opportunities identified by the appropriate transport strategies and that our development strategy seeks to support the delivery of strategic and local transport improvements.</p> <p>Comments have been passed to City Services</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</p>	<p>The appraisal village boundary designations (including an assessment of available services) is presented in the Settlement Assessment Background Paper.</p>

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<p>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. <ul style="list-style-type: none"> - 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. *Public Toilets – The lack of facilities on the A48 results in the Lych-gate to the Cemetery being used as a urinal. <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> <ul style="list-style-type: none"> • Traffic to and from the Nursing Home from Cardiff and Newport and Marshfield Road and Coal Pit Lane • Traffic to and from the Premier Inn and Coach and Horses from Cardiff and Newport, Marshfield Road and Coal Pit Lane 	<p>The role of the Local Development Plan is to facilitate new and improved services, but it does not directly allocate these or determine the location.</p> <p>As part of this process the LDP team will continue to work with partners, including Welsh Government and Transport for Wales, during the preparation of the replacement LDP to ensure policy reflect the opportunities identified by the appropriate transport strategies and that our development strategy seeks to support the delivery of strategic and local transport improvements.</p> <p>Comments have been passed to City Services</p>

<ul style="list-style-type: none"> • Traffic to and from Coal Pit Lane from Marshfield Road, the Service Station, Channel View, Craig y Haul, Newport and Cardiff • Traffic to and from Marshfield Road from Coal Pit Lane, the Service Station, Channel View, Craig y Haul, Cardiff and Newport • Traffic to and from Channel View to Newport, Marshfield Road, the Service Station, Craig y Haul, Cardiff • Traffic to and from Craig- y – Haul from Cardiff, Channel View, the Service Station, Coal Pit Lane, Marshfield Road, Newport • 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. <p>This most certainly would benefit from traffic management which is notably provided in less populated areas of Newport that have less junctions and less potential for accidents. The wellbeing of future generations should apply here. Waiting for more accidents and fatalities on this stretch of road before action is taken is abhorrent to the majority of road users and pedestrians. The cost of one fatality in a road traffic accident is in the region of £1.69 million!</p>	
<p><u>Illegal Parking Safety issues</u></p> <p>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 including dormice, otters, shrill carder bee and voles. Furthermore, archaeological sensitive areas should not be affected by new development. 	<p>The law in relation to AONBs is to be found in the Countryside and Rights of Way Act 2000, which provides for the designation of areas which (not in a national park) are of outstanding natural beauty.</p> <p>The Deposit Plan will include reviewed urban and village boundaries and Green Wedge designations.</p>

5) Arterial routes/lanes into and out of Marshfield should be protected from illegal development 'creep' of industrial sites.	
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GSO 010 - Councillor Pat Drewett - 00739

Question / Response	Officer Response
<p>Growth Options</p> <p>1. Are there any scenarios that have been discounted which should be considered further, and why?</p> <p>2. Which of the options do you feel is the most appropriate, and why?</p> <p>Assessment of Growth Options Against RLDP Objectives -</p> <p>3. Are there any other matters that should be taken account of when assessing these scenarios and identifying a Preferred Strategy?</p>	
<p>1) Because the war in Ukraine has lessened the resolve of many countries to reduce carbon emissions and coal and oil production is now increasing, even greater care should be taken to mitigate flood-risk across Newport by ensuring that development and land uses across Newport are resilient to the effects of climate change not only through minimisation and mitigation but also by means of physical infrastructure. The River Usk has the second highest rise and fall of the tide in the world with a tidal range of approximately 10 m at each tide. The tidal flow of the River Usk (commonly measured as the volume of water flowing at a given location every second) is 514 m³/s which is 156% greater than the River Severn at 329 m³/s. Climate change is likely to increase by as much as 4m the high water mark of each flood tide which represents a clear and evident threat not only to low lying areas but to the whole economy of the city. Newport does not want to be tagged as "Flood City".</p>	<p>The G&SO have been assessed at a high level in relation to their contribution to the emerging objectives of the plan, including:</p> <p><i>"Climate Change - To ensure that development and land uses in Newport are resilient to the effects of climate change, and actively tackle the causes and impacts of climate change through minimisation, adaptation and mitigation."</i></p> <p>The issues of climate change and flooding will be considered in further detail as the plan progresses.</p>
<p>TAN 15 is currently suspended to allow for re-assessment of the impact of climate change on flood-risk which is likely to identify and highlight an intensified risk of flooding in Newport. A revised TAN15 is due to be implemented in June 2023. To safeguard the city's residents, a flood defence barrier should be built across the river linking riverside bunds and with locks to allow the passage of small boats to form a central feature in planning for the future, since all citizens will be impacted in some way by flooding, whether or not they live in low-lying parts of the city. Safeguarding Newport's residents from flooding through a flood defence barrier across the river could well maximise other opportunities for the city's growth options by allowing an additional Riverside Growth Option.</p>	<p>Noted.</p> <p>Please note the coming into force of the new TAN 15 has been suspended due to a further consultation on the TAN. Planning Policy Wales, TAN 15: development and flood risk (First published: 30 July 2004, Last updated:24 November 2021) and the Development Advice Map (DAM), remain in place as the existing policy framework. The Flood Maps for Planning are a material consideration and are publicly available.</p>
<p>To ensure that the economy of Newport is resilient to the effects of climate change, one scenario which is missing from the options under consideration is the potential offered by the city's river. The River Usk offers an amazing additional scenario for development growth by providing space for several floating</p>	<p>Candidate Site assessments are being carried out as part of a separate process. The results of the Stage 1 assessment can be found in the Candidate Site's Register. Stage 2 of</p>

<p>home marinas along its banks from the Transporter Bridge to Caerleon. These floating marinas would be spaced out so that they did not detract from the riverscape - some catering for social housing and some for the luxury market. An active travel route already exists for much of these stretches of river adding value to the marina developments which would offer eco-friendly growth potential, meeting the needs of present and future communities, ensuring resource efficiency and improved health outcomes.</p> <p>The construction of a physical flood defence barrier across the River Usk near the Transporter Bridge to protect the city from the future effects of climate change would create a non-tidal water basin upstream of the barrier, making riverside growth a credible option for development. However such a flood defence barrier cannot be built without associated infrastructure to prevent effluent discharges into the river and to stabilise the water table. Floating marina developments along the river would assist Newport's economic growth by offering a new and diverse range of marine employment potential creating further opportunities to establish and enhance a circular local economy supporting a strong and resilient city. This type of development would provide high-quality homes in a national priority area for growth that meet the needs of the residents of the city as long as that these homes are supported by the necessary social, environmental, cultural and physical infrastructures that provide a safe, healthy environment to maintain and enhance community cohesion.</p>	<p>assessment will be published as part of the Preferred Strategy consultation.</p> <p>The role of the Local Development Plan is to facilitate new and improved services, but it does not directly allocate these or determine the location.</p> <p>As part of this process the LDP team will continue to work with partners, including Welsh Government and NRW, during the preparation of the replacement LDP to ensure policy reflects the opportunities identified by the appropriate flooding strategies and that our development strategy seeks to support the delivery of strategic and local improvements.</p>
<p>R The Hybrid Option, including the Riverside Growth Option, a mix of previously-developed land, ap sites on the edge of the urban boundary and sites surrounding existing villages is my preferred strategy o because it draws on the spatial benefits of all the other options, is flexible, adaptable and could be varied h in future as the need arises. A well-balanced Hybrid Option offers the best range of solutions for o Newport where inclusive, connected, adaptable, accessible and cohesive communities will thrive and o where Newport's Welshness is celebrated.</p>	<p>Noted. The Growth Option taken forward is discussed in detail in the Preferred Strategy Cabinet Paper, the Preferred Strategy Consultation Paper and associated Background Papers.</p>
<p>3) In Table 3 on page 15 of the report, there is a contradiction in the outcome assessment of growth options shown, in that Health and Well-being is shown as green across all options whereas Climate Change is marked red/orange. There is a discrepancy here as pointed out in paragraph no.1 above.</p>	<p>This assessment was produced for the purpose of the Growth and Spatial Options consultation, however the Integrated Sustainability Appraisal (ISA) assesses these in more detail.</p>
<p>Employment Land Review</p> <p>Recommendation One -</p> <p>4. Is this requirement appropriate for Newport?</p> <p>5. Should it be different and if so, why?</p> <p>Recommendation Two -</p> <p>6. Should some sites be removed from the employment supply? Why?</p> <p>7. Should alternative land uses be considered for some sites? Please provide examples of such uses and your rationale for this.</p>	
<p>4) I have no reason to challenge Recommendation One as it appears that the employment land supply remains buoyant in the emerging plan period.</p> <p>5) See Section no.4 above.</p>	<p>Noted</p>

6) I have no reason to challenge Recommendation Two.	
7) Please see my comments above in Section no.1.	
SPATIAL OPTIONS:	
8. Which of these options do you feel is the most appropriate, and why?	
9. Are there any other spatial distributions that should be considered, and if so, why?	
10. Are there any other matters that should be given consideration when assessing these?	
8) Given its coastal location, climate change is clearly going to have a major impact on development in the City of Newport.	Noted
9) None	
10) None	
EVIDENCE BASE:	
11. Are there any other pieces of evidence that you believe should inform the development of the preferred growth and spatial options strategies?	
12. Are there any other comments you'd like to make regarding anything within this consultation document? Do you agree with the Objectives for the RLDP? If not, how and why do you think they should be changed?	
11) Yes. Existing NRA flood maps for the area. A revised TAN15 is due to be implemented in June 2023. This will be supported by the new Flood Map for Planning, which will include climate change information to show how this will affect flood risk extents over the next century. It will show the potential extent of flooding assuming no defences are in place.	The RLDP will consider any new National Policy, Legislation, Guidance and TANs etc as they are published.
12) Please see Section #1 above.	

GSO 011 - Viv Batchelor - 00846

Question / Response	Officer Response
<p>The comments below are my feedback on the Consultation process for the RLDP, comments I raised with Mark Jones at the time we attended a face to face meeting. These represent my feelings as a resident, not as a Community Councillor, nor are they on behalf of Penhow CC.</p> <p>I'd like to raise some points that I made during the presentation by firstly asking a question.</p> <p><u>City or Village?</u></p> <p>I find it difficult to determine, from Newports written and online outputs such as publications, documents, newsletters and leaflets, just where Penhow sits, or is regarded, in the framework of 'Newport'. 'Newport' doesn't readily acknowledge its County role in its texts. The maps show Parc Seymour as an urban Inset 7. However we're in the Village option map. Penhow is not just Parc Seymour, and Penhow isn't mentioned. I see 'Newport' as Newport City and County Council.</p> <p><u>Communication.</u></p>	<p>The Deposit Plan will include a review of the urban and village boundaries. The Settlement Assessment Background Paper provides a village appraisal.</p>
	<p>Public involvement and transparency/ openness generally are key driving principles which guide the preparation of the</p>

<p>As a comment on the Consultation approach, I find it clear and easily understood, but narrow in its reach, and not transparent when it needs to be. In private industry, such a consultation, where comment is requested before any practical discursive information is available, would have no chance of a successful outcome for anyone. The timing of the next opportunity to attend a consultation meeting must come after we have the candidate list, and before the Preferred strategy is defined.</p> <p>We have notice boards that inform residents of and can only show a certain amount of information. Residents awareness and information sources on the LDP or RLDP will be mainly through online routes of communication, with no supporting leafleting to direct residents when key topics arise and where to look. The Press, local and National, continues to follow an opinion based editorial , on shock, alarmist or celebrity based topics, so front pages no longer lead on governance of the area often enough. Just like the Newport Matters publication, Newsletters on the RLDP, are only available online. Articles in Newport Matters are mainly limited to Newport City, anyway, and information pertaining to the whole County is poor.</p> <p>In a village of many new and long term retired residents, many of those won't have maintained their online connections if they ever had one, so I'd say out of all of the homes in Penhow we may have only a few residents reading anything regularly that 'Newport' publishes. In summary, the reach of information is very poor indeed.</p> <p>Families are increasingly finding homes in the village of Penhow. Their next job, their services, their education, their aspirations, depend on local information.</p> <p>We have to stop thinking that children should be the route for communicating on adult sensitivities and responsibilities, using schools to get messages out. Schools are not the places to bring local, political or selective social messaging for discussion. Communication needs to be full, not partial and not depend on the eldest and youngest generations to find out and pass it on. It didn't look to me as if the Ringland Community attended in any numbers, and there were only 8 or 9 residents present from Langstone and Penhow.... And that's a key consultation affecting everyone , held in Ringland. That should ring alarm bells in any consultation process.</p>	<p>RLDP. The Revised Delivery Agreement (agreed with the Welsh Government) includes a Community Involvement Scheme outlining how we will proactively involve the community and other stakeholders in the preparation of the RLDP and this is being followed.</p> <p>Anyone requesting to be to be involved in the RDLDP can specify that communication is via email or letter, and everything that has been produced and consulted on for the RLDP to date has been published on the Council's website. These documents can also be viewed in person by appointment either at the Civic Centre, or the Newport Central Library. Planning Aid Wales (PAW) has been engaged to undertake the public engagement activities for the RLDP For the Growth & Spatial Options Consultation they held 10 Events / Meetings (4 Online & 6 Face-to-Face)</p> <p>In addition to this, the Council shares any active consultations via the 'Have your Say' section of the Council's home page, as well as any public engagement events you can participate in under the 'News & Events' section of the home page. These are also promoted via our various social media platforms and bi-monthly editions of the Newport Matters publication and the RLDP Newsletters.</p>
<p><u>Transport.</u></p> <p>We have an increasing problem with the A48. During the last bout of bad weather, our old, badly maintained drainage, couldn't cope in two places within a half mile, with flooding which contributed to several serious accidents over several days. Speed, car maintenance, and driver behaviour contributed to them, too.... although we can't say that without evidence, but we can all see it. We have narrow roads and problems with parking, we have 50mph speed signs 200 yards from a junction and outside a park, there are no traffic calming measures, no road markings. Narrow lanes used by residents are increasingly pot holed , unkempt, or blocked by delivery drivers. The traffic levels are changing, the driving behaviour is changing, the motorist is changing. 'Newport' put a drop kerb on a pavement in Parc Seymour, it took</p>	<p>Noted</p> <p>The role of the Local Development Plan is to facilitate new and improved services, but it does not directly allocate these or determine the location etc.</p> <p>As part of this process the LDP team will continue to work with partners, including Welsh Government, Transport for Wales, NRW, the Police and Health Service during the preparation of the replacement LDP to ensure policy reflect the opportunities identified by the appropriate strategies and</p>

several days. residents of Newport City Homes park in front of it most of the time. No one can see the point of the drop kerb. It wasn't what was needed, and nothing else changes.

The A48 has, in the main, a 40 or 50mph driving limit, rising to a 60mph limit in Monmouthshire's part. All residents know that means a lot of drivers will be moving at a speeds of up to 70mph and above, between the Coldra and Chepstow. Double white lines, and hatched and coloured road surfaces on the A48 do not stop overtaking on it by drivers in a hurry at high speed, any more than a badly placed drop kerb makes crossing the road safer. We need a review, to look again at speed limits, pavements, paths, lanes, lay bys , so that drivers and cyclists can pull out of side roads without harassment from drivers in a hurry, so that tractors can move safely, so that pedestrians can cross roads and negotiate lanes. This is before any growth or spatial options for the RLDP are considered.

We weren't considered for the fflecsi bus route, and even though it's now not available, how does that fit with an urban inset 7?

Signage.

When our village road signs fell into disrepair we had to replace them via the Community Council from the precept. That's not something Newport City residents would accept. We cannot keep using the precept as a parish source of funding, if Newport City and County Council takes an urban view of what's needed.

Emergency Support.

When we had travellers arrive, we had a very slow attendance time for representation from Newport City and County Council and again the huge effort and cost fell to the precept . The Police did nothing except make it impossible for residents to solve the problem on that day.

Criminality and Policing.

Speeding. Parking. Littering. Flytipping.

We have no attention to any of it without incessant Report it efforts, online, to Newport City and County Council, and we are always on the back of our hard working City Councillors. We have been promised Police attention to the many off road bikes tearing through the village and the A48 on their back wheels, in excess of speed limits, making abusive gestures , so they can drive in the forest, churning it up, intimidating walkers and ruining ancient barrows. We're reduced to reporting the broken stiles, asking for Forest gates and repairs for potholes, lay-bys and banks in the lanes, as repeated piecemeal exercises rather than as part of what should be a Newport County willingness to provide routine support. I started a litter picking group, but stopped because I was pick up empty cocaine bags in the lay bys on the A48. That's a policing and highways issue, if people are driving under the influence of drugs or alcohol.

Volunteers are self supporting.

There is no amenity in Penhow that isn't run by volunteers, including our shops, Church and Chapel halls, social groups and Community Council. There are no surgeries, doctors, dentists, libraries and banks, and

that our development strategy seeks to support the delivery of strategic and local improvements.

Comments have been passed to City Services and Environmental Health

<p>you'll rarely see anyone waiting in the bus stops on the A48. There is now no part time Post Office Service , and Newport needs to update its website for our postcode. Just take a look at the distances quoted for travel to services.</p> <p>So, I wonder now what Newport City and County Council will do for the future for even our current infrastructure, let alone a changed one, if the RLDP outcome gives the preferred strategy as the Village option and is either business or population led . Penhow has constraints of geography, topography, amenity, natural environment and history, too.</p> <p>In my short time as a Community Councillor, and relatively short time as a resident of a Penhow , I can't see Newport City and County Council assessing the viability of any new businesses and new home building effectively in Penhow, and it needs to take an immediate and serious look at what it's doing now.</p> <p>New residents in Caldicot won't shop in Caldicot, it's failing rapidly. They won't like Newport City without good quality shopping, nor Chepstow for lack of parking and traffic levels, but they will maybe go to Spytty and that'll be via the A48, from which they'll soon find Newports back roads into Cardiff.</p> <p>Accidents, winter weather conditions and summer traffic all impact on the A48, drivers want a quick route to work and a quicker one home.</p> <p>Think change is inevitable, to support growing and changing populations, for a healthy Welsh economy. The pandemic has changed people's perceptions of themselves and expectations of others, there's no reset button. Businesses from outside Wales and from inside take up Welsh government grants but provide little long term growth. They renege on employment promises, take the funds, fail, start again.....and again....giving the Welsh economy few opportunities even to aspire to , let alone, see the community benefits of growth.</p> <p>Time for a wake up call, a bit of care, and a change of approach, before determining a growth strategy, but at least we are , as you said, in the process early, so can hopefully use a voice that has a chance to be heard, and hope for some effective listening to be done.</p>	
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GSO 013 - Jonathan Hughes - 00783

Question / Response	Officer Response
<p>Growth Options</p> <ol style="list-style-type: none"> 1. Are there any scenarios that have been discounted which should be considered further, and why? 2. Which of the options do you feel is the most appropriate, and why? Assessment of Growth Options Against RLDP Objectives - 3. Are there any other matters that should be taken account of when assessing these scenarios and identifying a Preferred Strategy? 	
<p>By way of background, Cwmpas, previously known as the Wales Co-Operative Centre, is a development agency focused on building a fairer, greener economy and a more equal society, where people and planet come first. Established in 1982, Cwmpas have made it their mission to change the way our</p>	<p>Noted</p>

<p>economy and society works. Cwmpas is a not for profit organisation which supports Wales' economic growth, helps communities to become stronger and more inclusive and in turn supports people in Wales to improve their lives and livelihoods by delivering a range of projects which help social businesses to grow; help people to learn digital skills, help people set up their own co-operatives in care and housing and help people to invest in their community.</p> <p>It is considered to be fundamental that any assumptions, scenarios or options need to reflect the recognition of Newport as a centre for national growth, its place in the South East Wales regional hierarchy, the context of Severnside development on either side of border between Wales and England, and finally, the role and impact of major infra-structure projects either side of the border.</p> <p>It is viewed as a positive feature that Previously Developed Land (PDL) is a key component for new development opportunities but that this is and should be supplemented by new land allocations not previously developed. This is particularly important to ensure deliverability and viability of new development given issues around site size, configuration, access and former use legacy of PDL.</p> <p>It is agreed that those options and scenarios that do not support or align with the role of Newport as a centre for national growth are set aside at an early stage in the considerations as they would simply not conform to the wider strategic policy framework.</p>	
<p>In considering the most appropriate option, it is suggested that the Dwelling Led 10 Year option is preferable. This provides a longer term view of historic trends, smooths out peaks and troughs in the levels of development activity and provides for a sustainable, deliverable level of growth that recognises past trends and future capacity to accommodate growth whether that be environmental, social or economic sustainability.</p> <p>Furthermore, when looking at the RLDP Objectives, it is evident that many if not all are set in the context of the Well-Being of Future Generations Act but that as the plan evolves it will be important to move from the quantitative allocation of uses and area to a qualitative assessment which will allow mitigation of some of the issues around natural environment, biodiversity and climate change in terms of how that development is undertaken.</p>	<p>Noted. The Growth Option taken forward is discussed in detail in the Preferred Strategy Cabinet Paper, the Preferred Strategy Consultation Paper and associated Background paper.</p>
<p>By way of other matters that could be addressed, Cwmpas sees a clear synergy between the key issues, challenges, options and scenarios of the Newport Replacement Local Development Plan and community led housing programmes and projects. Community-led housing is housing development where the community plays an integral role in identifying local needs and bringing a proposal forward with a view to delivering social and economic benefits to a local area. Such projects must meet long term housing needs and will provide affordable housing for local people. This can include all types of affordable housing meeting defined within the Welsh planning policy context. Furthermore, there is a direct statement of support for community led housing projects within the Welsh Government 'Programme for Government 2021 - 2026'.</p>	<p>Noted.</p>
<p>Employment Land Options</p>	

<p>Recommendation One -</p> <p>4. Is this requirement appropriate for Newport?</p> <p>5. Should it be different and if so, why?</p> <p>Recommendation Two -</p> <p>6. Should some sites be removed from the employment supply? Why?</p> <p>7. Should alternative land uses be considered for some sites? Please provide examples of such uses and your rationale for this.</p>	
<p>It is emphasised that employment land options must provide a framework for conformity with the acknowledged national growth role of Newport. Moreover, recognition must be made that employment land allocations are underpinned by suitable and appropriate infras-structure whether that be physical in terms of transport and movement or social in terms of housing, education or health facilities. By doing this, it is considered that the optimum and holistic benefits and outcomes will be achieved for Newport through using the RLDP to foster wider well-being and economic and social prosperity. Similarly, and for subsequent consideration as the RLDP evolves will be the need to ensure that not just quantitative allocations of employment land are made but that the nature and type of site is considered to provide a diverse range of opportunities to attract different employment types and being mindful of the physical environmental quality of those allocated sites.</p> <p>It is considered to be positive that scope for redesignation or repurposing employment sites for other land uses is developed within the RLDP. Pending the sustainability of the location and addressing viability issues around industrial legacy, it is suggested that housing could be a suitable alternative use where perhaps employment use is no longer viable. Moreover, whilst outside the remit of the RLDP, it is possible that such sites are in public sector ownership and as such the release for housing could support the delivery of RLDP housing targets and in particular affordable housing needs.</p>	<p>The Demographic Evidence, Employment Land Review (NB not executive summary) detail what key economic factors have been considered.</p> <p>Candidate Site assessments are being carried out as part of a separate process. The results of the Stage 1 assessment can be found in the Candidate Site's Register. Stage 2 of the assessment will be published as part of the Preferred Strategy consultation.</p>
<p>Spatial Options</p> <p>8. Which of these options do you feel is the most appropriate, and why?</p> <p>9. Are there any other spatial distributions that should be considered, and if so, why?</p> <p>10. Are there any other matters that should be given consideration when assessing these?</p>	
<p>When considering the spatial options, a preference is expressed for the 'Hybrid' option. This continues to use a component of PDL but as that alone will not meet the growth assumptions in the plan, it will need to be supplemented by urban expansion and village settlement growth.</p> <p>There are two key considerations that are suggested to be important in adopting such an option. Firstly, any new urban expansion or village settlement growth must be sustainable in terms of natural and built environment impact and also in terms of being sustained by suitable social infra-structure in terms of housing, affordable housing, community led housing, education, health and amenities such as local services and open space. Secondly, it is important that there is rigorous review against deliverability and viability criteria in planning, technical, legal and commercial or financial terms.</p>	<p>Noted. The Spatial Option taken forward is discussed in detail in the Preferred Strategy Cabinet Paper, the Preferred Strategy Consultation Paper and associated Background</p>

<p>Again, the qualitative nature of development will be critical as the plan develops, For example, in the area of housing land allocations, it will be important to address tenure and dwelling type and mix, placemaking and the role of community engagement and community led housing development. (Please refer to comments below).</p>	
<p>Evidence Base</p> <p>11. Are there any other pieces of evidence that you believe should inform the development of the preferred growth and spatial options strategies?</p> <p>12. Are there any other comments you'd like to make regarding anything within this consultation document? Do you agree with the Objectives for the RLDP? If not, how and why do you think they should be changed?</p>	
<p>The evidence bases being used are robust and of particular importance will be the Local Housing Market Assessments to determine the quantum, nature and type of housing to be developed.</p> <p>In addition to the evidence sources identified, it is suggested that perhaps a review or audit of current and proposed investment plans of various statutory bodies is undertaken as these can have a significant impact on the deliverability of the RLDP aspirations. This could include: utility services eg Dwr Cymru Welsh Water, transport, NRW (Flood Risk and Water Quality).</p> <p>The objectives for the RLDP are wide ranging and inclusive. However, whilst many of the objectives touch on the area, it is suggested that perhaps an overt and explicit placemaking objective is stated.</p>	<p>Noted As part of this process the LDP team will continue to work with partners, during the preparation of the replacement LDP to ensure any amendments to policy reflect the opportunities identified.</p>
<p>Other Comments</p>	
<p>In offering some further comments, Cwmpas would wish to outline some themes and issues around community led housing that could be developed within the RLDP and to the extent of defining specific policies within the RLDP for which there is precedent and proven track record elsewhere within the United Kingdom.</p> <p>For a scheme to be 'community led', the community must be integrally involved throughout the process of the development in terms of identifying the need and maintaining a strong involvement in delivering housing to meet that need even though in some cases the community does not necessarily have to initiate and manage the development process itself or build the homes themselves. Indeed, there are many ways for people to be involved in meeting their own housing needs. Community groups may respond to housing needs in their local area and seek to deliver their own homes. Local authorities, landowners, Registered Social Landlords (RSLs) or small builders may seek to provide housing that benefits the local area in perpetuity, and work with the community to enable this to happen. However, all such community led housing schemes are characterised by providing housing for the local community that is affordable and available in perpetuity and by providing far greater certainty to local communities as to who the housing will be occupied by and potentially offers new opportunities and benefits for sustainable local economic, social and environmental development.</p> <p>Finally, it is important to recognise that community led housing is not a case of 'one size fits all' as it can come about for a number of reasons and take a number of different forms. For example, co-housing is a design methodology used by intentional communities to create spaces that promote connectivity and</p>	<p>Noted</p>

<p>togetherness; housing co-operatives are housing organisations controlled, managed and owned by its members; and Community Land Trusts (CLTs) are legal entities set up by communities to provide and protect assets of community value such as genuinely affordable housing. As such, no two projects are the same. Community led housing can be adapted and moulded to create bespoke solutions that address particular issues and factors, whether socially or spatially, that have led to a group forming.</p> <p>In summary, community led schemes share three common principles: a requirement that meaningful community engagement and consent occurs throughout the process; the local community group or organisation own, manages or stewards the homes and in a manner of their choosing; and a requirement that the benefits to the local area and/or specified community are clearly defined and legally protected in perpetuity. More specifically, community led housing directly addresses the issues and challenges within Newport in terms of:</p> <p>Rebalancing demography through the creation of affordable community led housing that will create opportunities to retain and attract young people and thereby foster social and economic sustainability of the communities of Newport;</p> <p>Addressing inequality by increasing the amount, quality and choice of affordable housing options within the City;</p> <p>Addressing the climate emergency with net zero housing developments that are inherently sustainable in terms of build standards and technology, founded upon placemaking principles, reduce dependence of private modes of transport in favour of active travel and which provide green spaces and local food production opportunities; and,</p> <p>Addressing the nature emergency where preservation and enhancement of the biodiversity qualities of a site is a key component.</p>	
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GSO 014 - Charlotte Foulston - 00848

Question / Response	Officer Response
<p>Growth Options Growth Scenarios -</p> <ol style="list-style-type: none"> Are there any scenarios that have been discounted which should be considered further, and why? Which of the options do you feel is the most appropriate, and why? <p>Assessment of Growth Options Against RLDP Objectives -</p> <ol style="list-style-type: none"> Are there any other matters that should be taken account of when assessing these scenarios and identifying a Preferred Strategy? 	
<p>When considering different growth options, I would ask that the need for an integrated transport system is factored in which includes local rail services. I would like to know why the previous LDP mentions re-opening a rail station in Caerleon but the current plan doesn't. My reasons for pursuing this as an option are:</p>	<p>The Newport Local Development Plan currently includes policy T1, which supports all proposals for new stations, including a station at Caerleon. The role of the Local Development Plan is to facilitate new and improved stations,</p>

<p>-Reduction in local vehicle traffic and the associated poor air quality (well documented) which affects not only residents but the unique archaeology associated with Caerleon</p> <p>-An alternative means for tourists to visit this historic site without putting additional pressure on existing road infrastructure and the already very limited parking options. Caerleon, and by extension Newport, needs to attract visitors to what should be a UNESCO World Heritage Site. The importance of this Roman town cannot and should not be underestimated. This aspect of development has been underrepresented in previous plans.</p> <p>-Encourages local residents to leave their cars at home and walk, which has wider health benefits and helps build community cohesion.</p> <p>-Reopening the railway station in Caerleon would bring employment opportunities not limited just to the station.</p> <p>-The line already serves Newport to Cwmbran; New Inn's railway station is being developed creating further rail link options. It would be possible to travel anywhere in the country to and from Caerleon given these links.</p>	<p>but it does not directly allocate these or determine the location of new stations.</p> <p>As part of this process the LDP team will continue to work with partners, including Welsh Government and Transport for Wales, during the preparation of the replacement LDP to ensure any amendments to policy T1 reflect the opportunities identified by the appropriate transport strategies and that our development strategy seeks to support the delivery of strategic and local transport improvements.</p>
<p>When considering the growth options, I would ask that the unique nature of Caerleon's Roman heritage be taken into account. As mentioned above, this Roman fort town is incredibly important and could be developed far more strategically to attract tourism and its associated revenues and opportunities.</p>	<p>The Growth options have been a high level in relation to their contribution to the emerging objectives of the plan, including:</p> <p>“Historic Environment- To preserve, enhance and realise the value of Newport’s heritage resources, through investment, interpretation and maximisation of those opportunities provided by the distinctive historic environment and archaeological assets.”</p> <p>The issues of the historic environment will be considered in further detail as the plan progresses.</p>
<p>Employment Land Review</p> <p>Recommendation One -</p> <p>4. Is this requirement appropriate for Newport?</p> <p>5. Should it be different and if so, why?</p> <p>Recommendation Two -</p> <p>6. Should some sites be removed from the employment supply? Why?</p> <p>7. Should alternative land uses be considered for some sites? Please provide examples of such uses and your rationale for this.</p>	
<p>Brown field sites should be the first consideration for any new development; decommissioned industrial sites already have the infrastructure in place, e.g. roads, utilities, to support further development in the first instance.</p>	<p>Noted. The Growth Option taken forward is discussed in detail in the Preferred Strategy Cabinet Paper, the Preferred</p>

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<p>Newport's past industrial legacy has already left its mark on the landscape; development should not encroach onto existing green field sites.</p> <p>Newport sits on the edge of some of the most beautiful and biodiverse areas of the country (Brecon Beacon, Usk Valley for instance) and these should be protected for future generations to benefit from.</p>	<p>Strategy Consultation Paper and associated Background Papers.</p>
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GSO 015 - Great Western Railway - 00771

Question / Response	Officer Response
<p>Great Western Railway recognises the need to engage with the LDP process and welcomes the opportunity from Newport to engage at this early stage.</p> <p>While Growth options are best discussed by other respondents, GWR supports the need to develop spatial options which can be served effectively by public transport - this is more important to the spatial options than which of the three options proposed is progressed.</p> <p>The public transport offer for development needs to be relevant & appealing for new residents or commercial occupiers and needs to be in place prior to occupation. This is more difficult to achieve if development is located away from existing or proposed public transport corridors, where new development is unlikely to generate passenger or revenue volumes to support ongoing operational costs.</p> <p>An approach which supports development around strategic transport corridors could sustain higher levels and more effective use of public transport resource.</p>	<p>Noted. We look forward to working collaboratively as our plan progresses.</p>

GSO 0016 - Lewis Homes (South Wales) Ltd - 00661

Question / Response	Officer Response
<p>Growth Options</p> <ol style="list-style-type: none"> 1. Are there any scenarios that have been discounted which should be considered further, and why? 2. Which of the options do you feel is the most appropriate, and why? Assessment of Growth Options Against RLDP Objectives 3. Are there any other matters that should be taken account of when assessing these scenarios and identifying a Preferred Strategy? <p><u>Background:</u></p> <p>Chapter 3 of the Growth and Spatial Options Document presents and seeks feedback on a series of growth scenarios which would in turn inform the housing requirement and employment land requirement. Initially, 12 scenarios are presented in Table 1 with Table 2 further refining this down to six Growth Options. Lewis Homes has control of, and is promoting for residential development, the site known as "Land at Coal Pit Lane, Castleton". Given Lewis Homes' interest within Newport, the Growth Strategy is only relevant in so much as it informs the housing requirement with matters relating to the required job provision (and associated employment land requirement) not of relevance.</p>	<p>Candidate Site assessments are being carried out as part of a separate process. The results of the Stage 1 assessment can be found in the Candidate Site's Register. Stage 2 of the assessment will be published as part of the Preferred Strategy consultation.</p> <p>Noted.</p>

<p><u>Context:</u> National planning policy is clear as to how a housing requirement should be formulated with Paragraph 4.2.6 of Planning Policy Wales Edition 11 (February 2021) stating that: "The latest Welsh Government local authority level Household Projections for Wales, alongside the latest Local Housing Market Assessment (LHMA) and the Well-being plan for a plan area, will form a fundamental part of the evidence base for development plans. These should be considered together with other key evidence in relation to issues such as what the plan is seeking to achieve, links between homes and jobs, the need for affordable housing, Welsh language considerations and the deliverability of the plan, in order to identify an appropriate strategy for the delivery of housing in the plan area. Appropriate consideration must also be given to the wider social, economic, environmental and cultural factors in a plan area in order to ensure the creation of sustainable places and cohesive communities." From the above text it is clear that: 1. Household projections should be used as the starting point for establishing the housing requirement; but that 2. Other elements of the evidence base should also underpin the housing requirement; and that also 3. The wider political, economic, social, and environmental context, combined with what the Local Planning authority (LPA) want the Replacement Local Development Plan (RLDP) to achieve, should be considered.</p>	
<p><u>Point 1 - Household Projections</u> Lewis Homes suggest that the correct projection to use is the WG-2018-HIGHPOP (Growth Option 2). The reason for this is that, unlike the WG-2018-Principal or the WG-2018-LOWPOP projections, it is re-based to the 2021 Census. This is the right starting point because it makes use of the most recent set of household projections (2018-based) whilst responding to the actual findings of the 2021 Census which provide an incredibly accurate snapshot in time that is more recent than the 2018-based projections. Put another way, it reflects the actual position on the ground, and the projections associated with it, at a fixed point in time rather than a wholly projected scenario. This is particularly important in the case of Newport City Council (NCC) where there is a significant under estimation of the position compared to the actual findings of the 2021 Census. This is articulated in the "LDP Demographics" Paper prepared by Edge Analytics on behalf of NCC which at Paragraph 2.25 states that: "Newport has seen the largest population increase between the 2020 MYE and 2021 Census population compared to other Welsh authorities (2.0%) (Figure 20). Only two out of the 22 Welsh authorities have seen an increase between the two population figures (Powys and Newport), with the rest of the authorities showing population declines." Taking the above together, it would be the right approach for LPAs, in general, to use the WG-2018-HIGHPOP going forward and this is particularly important for an LPA such as NCC where there is a significant diversion between the 2018-based projections and the 2021 Census.</p>	<p>Noted. The Growth Option taken forward is discussed in detail in the Preferred Strategy Cabinet Paper, the Preferred Strategy Consultation Paper and associated Background Papers.</p>

Point 2 - Evidence Base Elements:

Two of the options presented in Table 2 of the Growth and Spatial Options Document are the PG-Short Term and PG-Long Term scenarios (the PG-Long Term is also presented as a Growth Option in Table 2). These scenarios use the ONS 2020 Mid-Year Estimate and then calibrate either to assume migration rates over the last five years (in the case of the PG-Short Term) or 19 years (PG-Long Term).

The below table has been put together using the ONS' "Local Area Migration Indicators" dataset from September 2021 and shows the net balance of inflow and outflow over the last ten years to and from Newport from other parts of the UK. In this case, it is calculated by subtracting the number of people that leave NCC to move to another local authority from the number of people that move to NCC from another local authority:

Year,	Net Internal Inflow:
2010-2011	90
2011-2012	-197
2012-2013	-357
2013-2014	-485
2014-2015	-11
2015-2016	271
2016-2017	1098
2017-2018	1211
2018-2019	445
2019-2020	1118

The table shows a changing balance over the last 10 years, from a period where there was a net outflow of people from Newport to a situation since 2015-2016 where there has been a sustained and significant net inflow of people from Newport. Assuming a household size of 2.3 people, the net inflow would represent an additional 486 homes per annum for 2019/2020. The 2018/2019 figure is an anomaly as a result of COVID19 - something that is recognised in Paragraph 2.15 of the "LDP Demographics" Paper.

The "LDP Demographics" Paper prepared by Edge Analytics explains why it is the case that there has been a net inflow since 2015/2016 at Paragraph 2.14 which states that:

"Likely factors driving this increase include the rate at which new homes have been built, the removal of the Severn Bridge toll in 2018 and the introduction of ONS' Higher Education Leavers Methodology (HELM)."

The fact that this the greatest net inflow is from Bristol, North Somerset, and South Gloucestershire (Figures 14 and 15 of the LDP Demographics Paper) helps to confirm this conclusion.

The position with regards to the Severn Bridge tolls is fixed - the tolls have been removed and there is no indication of them being re-introduced. There is therefore no structural reason as to why the net inflow of people would reverse in coming years.

Noted. The Growth Option taken forward is discussed in detail in the Preferred Strategy Cabinet Paper, the Preferred Strategy Consultation Paper and associated Background Papers. To be passed to Edge for further consideration.

<p>Lewis Homes do not suggest it would be the right approach for either of the PG scenarios to be chosen as a Growth Option as ultimately they look at previous trends rather than future projections to come over the RLDP plan period, but it is clear that the level of UK based migration is such that a significant uplift on the selected demographic scenario should be applied and that this should be based on a PG option that considers the level of net internal migration over the last four years since the tolls have been removed (excluding the year effected by the COVID19 pandemic) rather than a longer time window. This should be applied as a "multiplier" on top of Growth Option 2.</p>	
<p><u>Point 3 - Wider Political, Economic, Social, and Environmental Context:</u> The main document that sets out how Newport should be seen in the context of the wider South East Wales region is Future Wales: The National Plan 2040. The status of Future Wales: The National Plan 2040 and what it means for Newport is set out in Section 2.1 of the Growth and Spatial Options document. There's no need to repeat what is said in either document here but it is clear from Policy 33 (National Growth Areas - Cardiff, Newport, and The Valleys) that Newport should:</p> <ul style="list-style-type: none"> - Have an increased strategic role for sustainable long term growth - Be a growth pole for new housing in the eastern part of South East Wales - Work alongside neighbouring authorities (both in South East Wales and England) to achieve this. <p>The implications of this are that any Growth Option selected must be aspirational and this is recognised in Section 3.1 of the Growth and Spatial Options document which, on Page 12, explains that a number of the options suggested in Table 1 have been dismissed due to their low scale of growth not being in conformity with Future Wales: The National Plan 2040. The status of Newport in Future Wales: The National Plan 2040 is such that there is further justification for the selection of Growth Option 2 as a starting point given that it is aspirational in nature whilst the encouragement to work with neighbouring local authorities suggests that net inflow into Newport from neighbouring authorities should be welcomed and planned for through the incorporation of a PG scenario.</p>	<p>Noted. The Growth Option taken forward is discussed in detail in the Preferred Strategy Cabinet Paper, the Preferred Strategy Consultation Paper and associated Background Papers.</p>
<p><u>Assessment of Growth Options Against RLDP Objectives:</u> Appendix A of the Growth and Spatial Options Document provides an appraisal of the performance of the six Growth Options against the 10 RLDP Objectives, in essence allowing to create a matrix that allows for comparison between the various options. This is built upon further in Appendix A of the Document. Lewis Homes' concern is that the assessment undertaken as part of Table 3 and in Appendix A assumes that a certain Growth Option will have an "Amber" or even "Red" impact when the selection of appropriate sites which are environmentally and technically acceptable (or incorporate appropriate mitigation, compensation, and enhancement to achieve this) can mean that they can be delivered without a negative impact (i.e. with a "Green" or, at worst, "Amber" impact). In this sense, it is essential to stress that the comprehensive submission that Lewis Homes made as part of the Call for Sites</p>	<p>Noted. This assessment was produced for the purpose of the Growth and Spatial Options consultation, however the Integrated Sustainability Appraisal (ISA) assesses these in more detail.</p> <p>Candidate Site assessments are being carried out as part of a separate process. The results of the Stage 1 assessment can be found in the Candidate Site's Register. Stage 2 of the assessment will be published as part of the Preferred Strategy consultation.</p>

<p>demonstrated that "Land at Coal Pit Lane, Castleton" could be delivered in a way which is technically and environmentally sound such that the performance against many of these objectives could instead be considered to be "Green" in this context.</p>	
<p><u>Extent of Flexibility Allowance:</u> Paragraph 5.58 of Edition 3 the Development Plans Manual (March 2020) is clear that there is a requirement for a flexibility allowance to be added on top of the housing requirement to derive the number of homes than RLDP should plan for. This is in the interest of ensuring that sufficient housing is delivered when some allocated sites either are not delivered or deliver less home than anticipated. Paragraph 5.59 of Edition 3 the Development Plans Manual is clear that the extent of the flexibility allowance should be informed by local issues with 10% as a starting point (i.e. as the minimum). Lewis Homes recognise that the extent of the flexibility allowance will be determined considerably later in the RLDP preparation stage, likely at Deposit stage and that it is inappropriate to comment too much on this at this time. That said, Indicator OB4 MT3 of the Annual Monitoring Report (October 2022) for the period from April 2021 to April 2022 recognised a cumulative shortfall in housing delivery against the LDP's housing trajectory. Historic performance against this indicator is presented in the table below: Year/% Delivery Against Cumulative Required Rates 2015 -5%, 2016 3%, 2017 -2%, 2018 -6%, 2019 -9%, 2020 -12%, 2021 -14%</p> <p>Importantly, this is against the housing requirement of 10,350 homes and not the 11,623 homes that the adopted LDP plans for. In essence, in 2021 where the rate is a -14% rate, this is 14% below the housing requirement but 26% below the number of homes that were planned for which incorporated the 12% buffer in the adopted LDP. Even at this stage it is clear from the above that the 12% buffer in the adopted LDP is entirely inadequate and a greater buffer should be incorporated for the RLDP.</p>	<p>Noted, the Preferred Strategy Cabinet Paper, the Preferred Strategy Consultation Paper and associated background papers provide greater detail on this.</p>
<p>Lewis Homes (South Wales) Ltd - 00661 Spatial Options 8. Which of these options do you feel is the most appropriate, and why? 9. Are there any other spatial distributions that should considered, and if so, why? 10. Are there any other matters that should be given consideration when assessing these?</p>	
<p><u>Background and Policy Context:</u> Chapter 4 of the Growth and Spatial Options Document presents four Spatial Options as to how the requirements outlined in Chapters 2 and 3 should be distributed spatially. Four options are presented - one which would be to focus new housing on previously developed land, a second which would be to</p>	<p>Noted</p>

focus on a series of greenfield allocations on the edge of the urban boundary, a third of directing growth to nine identified villages, and a fourth which is a hybrid of the previous three options.

Commentary on Reliance on Previously Developed Land Approach:

The first paragraph in Section 5 of the Growth and Spatial Options Document is presented below:

"There is a need to prioritise the re-use of previously developed land (PDL). The adopted strategy supports a PDL-led approach, with a considerable amount of development being delivered on previously developed land since the adoption of the LDP in 2015. While the merits of continuing this strategy are understood, there is some concern that previously developed land is a finite resource and the availability of sites may not be as buoyant as it was or the reuse of land for housing may require the de-allocation of some employment sites."

Whilst there is no doubt that the delivery of PDL is prioritised in national planning policy, the Growth and Spatial Options Document recognises that there is not going to be sufficient previously developed land available for the continuation of the PDL- led approach taken in the adopted LDP. The first paragraph of Section 5 of Document is clear on this, stating that:

"While the merits of continuing this strategy are understood, there is some concern that previously developed land is a finite resource and the availability of sites may not be as buoyant as it was or the reuse of land for housing may require the de-allocation of some employment sites."

On this basis, the selection of the PDL-led Spatial Option is not going to be sufficient to meet the higher Growth Options (and importantly the Growth and Spatial Options paper discounts the lower Growth Options). There is also a wider point as to whether reliance on a PDL-led strategy is a sufficiently robust Spatial Strategy to ensure that the housing requirement is delivered in full. The adopted LDP relies on a PDL-led strategy and, as set out in connection to the flexibility allowance for the Growth Options Questions, this has resulted in a significant shortfall of housing delivery compared to the housing trajectory. Analysis from the Annual Monitoring Report (October 2022) for the period from April 2021 to April 2022 shows that there are 1,189 (equating to 11.5% of the total housing requirement) units that the adopted LDP anticipated to be delivered on brownfield sites in the adopted LDP plan period but now are not expected to be delivered prior to its end date in 2026.

From the above, it is clear that there is not enough PDL land for the implementation of a PDL-led Spatial Strategy and that, even if there was, the implementation of a PDL-led approach would likely result in a shortfall in delivery against requirement.

Lewis Homes therefore suggest that:

- Any PDL allocations in the adopted LDP where development has not commenced should continue to be supported through a positive allocation but should not be relied upon to meet the housing requirement;
- No PDL allocations should be made on sites with capacity for less than 50 homes. These should be allowed to come forward as windfall sites; and

<p>-New PDL allocations in excess of 50 homes that are counted towards meeting the housing requirement should only be made where it has been demonstrated that these are viable.</p>	
<p><u>Suggested Approach:</u> The higher Growth Options (including the modified Option 2 that Lewis Homes are suggesting) that are set out in the Growth and Spatial Options Document are unlikely to be able to be met in their entirety through either the "Village Focus" Spatial Option or the "Urban Expansion" option and therefore it is suggested that the "Hybrid" Spatial Option is really the only suitable Spatial Option that can deliver the higher Growth Options that are suggested and continue to perform strongly against the RLDP's objectives. A part of this Spatial Option, Lewis Homes emphasise the role that certain sustainable Villages should play as part of this Spatial Option. By their very nature, the Villages are located throughout the NCC, and directing growth to the more sustainable Villages will mean that housing is dispersed and will likely be delivered by a greater number of different developers compared to an option which concentrates growth in a smaller number of locations. This is beneficial for consumer choice - both in terms of the location that someone chooses to live and the type of home that they want to buy. This should be seen as being particularly attractive in the context of the adopted LDP which, by virtue of the PDL-approach that it takes, did not allocate additional sites in any of the nine villages identified as part of the "Village Focus" Spatial Option - instead in the Villages either rolling over historic allocations in the Unitary Development Plan or relying on previously developed sites that benefited from planning permission and the time the current LDP was adopted. Page 56 lists nine Villages that new development would be directed to if the "Village Focus" Spatial Option was selected and would presumably constitute the "Village" element of the "Hybrid" Spatial Option. "Castleton and Marshfield" appear to have been considered together and it is noted that this has been the case in the adopted LDP (most notably with regards to the Inset Maps). In that sense, it is assumed that the "Broad Location for New Growth Under Housing Scenario" identified with the "Village Focus" Spatial Option as being located in Marshfield relates to both Castleton and Marshfield and does not indicate a preference of one over the other to accommodate new housing. [MAP ATTCHED -extract from G&SO Paper] If the approach in the adopted LDP continues to be taken of considering the two together, it is important that this does not prevent new housing being allocated in both (rather than either) settlement.</p>	<p>Noted. The Spatial Option taken forward is discussed in detail in the Preferred Strategy Cabinet Paper, the Preferred Strategy Consultation Paper and associated Background</p>
<p>Whilst Lewis Homes support an approach that directs new housing to Villages in general, it is apparent that there are substantial differences between the various Villages with regards to sustainability, accessibility, and overall ability to accommodate new housing. Whilst presumably the evidence base will include an appraisal of the sustainability of these Villages, the below table provides a "Red" and "Green" assessment of the availability of certain services within each.</p>	<p>Candidate Site assessments are being carried out as part of a separate process. The results of the Stage 1 assessment can be found in the Candidate Site's Register. Stage 2 of the assessment will be published as part of the Preferred Strategy consultation.</p>

Village	Primary School	Local Shop	Bus Stop	Village Hall	Public House	POS	Doctors / Pharmacy
Castleton and Marshfield	Green	Green	Green	Green	Green	Green	Green
St Brides	Red	Red	Red	Green	Red	Red	Red
Bishton	Red	Green	Red	Green	Red	Red	Red
Llanwern	Green	Green	Red	Green	Red	Green	Green
Underwood	Green	Green	Green	Green	Green	Green	Green
Llanvaches	Red	Red	Red	Green	Red	Green	Red
Parc Seymour	Red	Green	Green	Red	Red	Green	Red
Christchurch	Red	Green	Green	Green	Green	Green	Red
Caerleon	Green	Green	Green	Green	Green	Green	Green

The Deposit Plan will include a review of the urban and village boundaries. The Settlement Assessment Background Paper provides a village appraisal.

From the above, it is clear that Castleton and Marshfield is one of the three most sustainable and accessible Villages and has a considerably broader range of services than settlements such as St Brides, Bishton, Llanvaches, and Parc Seymour. Lewis Homes therefore suggest that the proportion of new housing directed to each Village should be dependent on its accessibility, sustainability, and range of services with the more sustainable Villages, such as Castleton and Marshfield, accommodating a greater number of new homes.

Not only is Castleton and Marshfield one of the more sustainable Villages, Castleton is also a fundamentally good location for new housing for the following reasons:

Castleton is outside of the Green Belt in the adopted LDP (importantly, unlike Marshfield) and, unlike other villages north of the M4, -Castleton is not within the "Assumed Area Under Consideration for New Green Belt"

There are a range of services nearby within Castleton and Marshfield that can be accessed by active travel and the improvements to the A48 proposed as part of the "Cardiff to Newport Active Travel and Bus Corridors" consultation by Transport for Wales will improve this

-Directing new housing to Castleton and Marshfield would assist with spatially distributing new housing given that seven of the nine Villages are in the eastern part of NCC, as are many of the sites that will be rolled over from the adopted LDP; and

-There are sites which are suitable, deliverable, and viable - Lewis Homes has demonstrated that "Land at Coal Pit Lane, Castleton" site is one such example.

GSO 017 - Councillor Chris Reeks - 00757

Question / Response	Officer Response
<p>Growth Options Growth Scenarios - 1. Are there any scenarios that have been discounted which should be considered further, and why?</p>	

<p>2. Which of the options do you feel is the most appropriate, and why? Assessment of Growth Options Against RLDP Objectives -</p> <p>3. Are there any other matters that should be taken account of when assessing these scenarios and identifying a Preferred Strategy?</p>	
<p>The population growth is most appropriate, but it needs to be higher, the influx of people already into the city has outstripped the predictions and this will only continue to rise. Employment led is not appropriate as Newport is more of a transient city housing people who work outside of the area.</p>	<p>Noted. The Growth Option taken forward is discussed in detail in the Preferred Strategy Cabinet Paper, the Preferred Strategy Consultation Paper and associated Background Papers.</p>
<p>Employment Land Review Recommendation One -</p> <p>4. Is this requirement appropriate for Newport? 5. Should it be different and if so, why?</p> <p>Recommendation Two -</p> <p>6. Should some sites be removed from the employment supply? Why? 7. Should alternative land uses be considered for some sites? Please provide examples of such uses and your rationale for this.</p>	
<p>Q4 again the requirement is inadequate for Newport, a recent case in point where a company wanted to relocate to Newport and open a factory to employ local people highlighted the issue of very little suitable warehouse space available and the company is now looking outside of the borough completely. This situation will be exacerbated by the influx of people, some of whom (but not all) will seek employment in the city.</p>	<p>Noted. The Growth Option taken forward is discussed in detail in the Preferred Strategy Cabinet Paper, the Preferred Strategy Consultation Paper and associated Background Papers.</p>
<p>Spatial Options</p> <p>8. Which of these options do you feel is the most appropriate, and why? 9. Are there any other spatial distributions that should be considered, and if so, why? 10. Are there any other matters that should be given consideration when assessing these?</p>	
<p>The spatial options needs to consider a mix of all three options of PDL/Village/Urban, with the repurposing of the city centre to become a more eclectic mix of living and working properties to regenerate the economy as well as providing more living space for residents. Each one on its own will not solve the problem as it will lead to over-population in a particular and more of the same problems we face across the city currently.</p>	<p>Noted. The Spatial Option taken forward is discussed in detail in the Preferred Strategy Cabinet Paper, the Preferred Strategy Consultation Paper and associated Background</p>

GSO 018 - Mr Paul J Cromwell - 00251

Question / Response	Officer Response
<p>As per your letter dated 24th Jan 2023, I would like to comment regarding the local development plan which years ago I have put into the UPD and more recent LDP for my ground in Redwick. I would like to put in this ground again to the LDP, I cannot see why last time of Newport City Council why they have taken away the boundaries of six villages that I feel should be entitled to have their boundaries back, and</p>	<p>Noted. The Deposit Plan will include a review of the urban and village boundaries. The Settlement Assessment Background Paper provides a village appraisal.</p>

<p>therefore these boundaries should not have been taken away in the first place. There has been no growth in these villages since the last LDP was introduced 5 or 6 six years ago.</p> <p>I know that Newport has brown field sites, some which are heavily contaminated over many years and some of these sites cannot be brought into residential use because of circumstances as previously stated ie heavily contaminated ground.</p> <p>The rural villages that fall within Newport City Councils authority have not considered the young people born and brought up in these villages and should be entitled for parcels of ground in these villages to be put into the LDP, also like myself who have owned ground in Redwick the boundary should consist of new housing falling within that boundary that should consist of the new LDP going forward this time around.</p> <p>I look forward to seeing your responses this time and hopefully unlike the past I could see development on my ground.</p> <p>Last time I did go before the inspectorate and if no consideration from Newport City Council is considered this time I will automatically want to go the Inspectorate this time around.</p>	<p>The Spatial Option taken forward is discussed in detail in the Preferred Strategy Cabinet Paper, the Preferred Strategy Consultation Paper and associated background papers.</p>
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GSO 019 - Elm Land Ltd - 00633

Question / Response	Officer Response
<p>Growth Options</p> <p>Growth Scenarios -</p> <p>1 Are there any scenarios that have been discounted which should be considered further, and why?</p> <p>2 Which of the options do you feel is the most appropriate, and why?</p> <p>Assessment of Growth Options Against RLDP Objectives -</p> <p>3. Are there any other matters that should be taken account of when assessing these scenarios and identifying a Preferred Strategy?</p>	
<p>1. There are no scenarios that have been discounted that should be considered further.</p> <p>2. The higher housing growth scenarios published in the growth and spatial options paper accurately reflect that the RLDP has to conform with the Future Wales' spatial strategy. The RLDP should recognise the National Growth Area as the focus for strategic economic and housing growth; essential services and facilities; advanced manufacturing; transport and digital infrastructure.</p> <p>Option 1 (Dwelling-led SYR) is the most appropriate of the growth scenarios to fulfil Future Wales. The Welsh Government is determined to see development and growth in Newport, allowing the city to fulfil its potential as a second focal point for the region. Highly skilled employment opportunities in the transport and digital communications sectors should be catalysts for further economic investments.</p> <p>Option 1 proposes the highest amount of dwellings across the local authority. This is essential to enhance Newport's economic role. The Dwelling-led 5YR scenario has a higher but realistic population change than Option 2 WG-2018-HIGHPOP. This is the step change necessary to achieve the National Plan.</p>	<p>Noted. The Growth Option taken forward is discussed in detail in the Preferred Strategy Cabinet Paper, the Preferred Strategy Consultation Paper and associated Background Papers.</p>

<p>Option 1 is the only option with housing supply above the current LDP strategy, therefore, reflecting Newport's focus for growth role established by the Future Wales National Plan 2040.</p> <p>3. Option 1 will overall bring a neutral contribution to the RLDP objectives; population and communities, health and wellbeing, equality, diversion and inclusion and transport and movement. The risk of not achieving a step change for the City and delivery of growth as envisaged in Future Wales should be a matter for consideration when assessing the scenarios. To de risk the plan the Preferred Strategy should be based upon a robust assessment of the capacity to deliver Option 1. Delivery and viability should be embedded in the next stages of the candidate site process. An adequate flexibility allowance should be applied to de risk the plan.</p> <p>The preferred strategy should be based on an objective assessment of the role and function of places within Newport in line with the search sequence and National Sustainable Placemaking Outcomes, as set out in PPW. This will create inclusive, connected, adaptable and accessible communities that are cohesive and ensure Newport's potential is realised.</p>	
<p>Employment Land options</p> <p>Recommendation One -</p> <p>4. Is this requirement appropriate for Newport? Should it be different and if so, why?</p> <p>Recommendation Two -</p> <p>6. Should some sites be removed from the employment supply? Why? Should alternative land uses be considered for some sites? Please provide examples of such uses and your rationale for this.</p>	
<p>Recommendation 1 is the minimum requirement to fulfil the expectations of Future Wales for Newport to be the focus for strategic economic growth; essential services and facilities; advanced manufacturing; transport and digital infrastructure.</p> <p>5. Yes, it should probably be different. If the supply to match the requirement is to include the sites identified in the ELR the requirement should be higher.</p> <p>Excluding land East of the Queensway the supply amounts to just over 90 hectares. However, just over 40 hectares is ring fenced for the expansion of Eastman (Solutia). It cannot be considered as readily available to meet the broader employment land requirement to fulfil the growth strategy. Furthermore, the ELR assesses the Accessibility, Environmental Factors and Market Attractiveness of nine sites (includes East of Queensway). Three sites are considered to score highly, amounting to just under 48 hectares.</p> <p>The requirement should be for 77 hectares of readily available, accessible, and attractive employment land. Given a site is ring fenced for Eastman (Solutia) the requirement should be for 117 hectares.</p> <p>6. Given the need to fulfil the local and sub regional (CCR) employment sites, other than land East of Queensway, should not be removed from the employment land supply.</p>	<p>Noted. The Growth Option taken forward is discussed in detail in the Preferred Strategy Cabinet Paper, the Preferred Strategy Consultation Paper and associated Background Papers.</p>

<p>7. TAN 23: Economic Development and PPW state that an existing employment site should only be released for other uses if other priorities, such as housing need overrides more narrowly focused economic considerations. The economic considerations are of national significance as per the growth strategy (Future Wales).</p>	
<p>Spatial Options</p> <p>8. Which of these options do you feel is the most appropriate, and why?</p> <p>9. Are there any other spatial distributions that should be considered, and if so, why?</p> <p>10. Are there any other matters that should be given consideration when assessing these?</p>	
<p>8. With regard to spatial options, a hybrid approach is favoured with a mixture of previously developed land, sites on the edge of the urban boundary and sites at surrounding existing villages. The Candidate Site between Church Lane and Marshfield Road at Marshfield could contribute to the Village Focus spatial option too. The current status of the site as per the adopted LDP is a greenfield site, adjoining the settlement boundary. Where there is a need for sites and there is no previously developed land or underutilised sites, consideration can be given to suitable and sustainable greenfield sites within or on the edge of settlements. A balance of previously developed land, sites on the edge of the urban boundary and sites at surrounding existing villages will ensure a range of locations and size of sites. A range of sites de risks the delivery of the RLDP.</p> <p>The hybrid approach scores highly against the RLDP objectives for Economy and Employment, health and wellbeing and biodiversity and geodiversity. Marshfield has a number of day-to-day facilities including a post office, village hall, church and several public houses. The Primary School is an approximate 15-minute walk away.</p> <p>There are several bus stops along Marshfield Road providing services to Newport and Cardiff. St Mellons, 3 miles to the east, has a range of facilities and amenities, including retail, employment, education, healthcare and a Tesco supermarket.</p> <p>In addition to a rounding off of the existing village settlement, the existence of the adjacent allotments provides a natural defensible boundary to the site ensuring that there is no possibility for 'urban/village sprawl'.</p> <p>Further, there is good developer interest from small to medium size house builders, a sector which Welsh Government policy has been very keen to support and see deliver more homes throughout Wales.</p> <p>9. The four spatial distributions provided cover the full range of options from urban to rural land use for development, with the addition of a mixture of both.</p> <p>10. To de risk the delivery of the plan as per the LDP Manual 3 a further matter for consideration is the delivery risk associated with each of the spatial options. Sites of a modest size at village locations provide a low-risk option to fulfil the growth required.</p>	<p>Noted. The Spatial Option taken forward is discussed in detail in the Preferred Strategy Cabinet Paper, the Preferred Strategy Consultation Paper and associated background papers.</p>
<p>Evidence Base</p> <p>11. Are there any other pieces of evidence that you believe should inform the development of the preferred growth and spatial options strategies?</p>	

12. Are there any other comments you'd like to make regarding anything within this consultation document? Do you agree with the Objectives for the RLDP? If not, how and why do you think they should be changed?	
<p>11. The current evidence base used to inform the development of the preferred growth and spatial options strategies is sufficient and critically encapsulates Newport as a growth in National planning policy.</p> <p>12. It is important that the RLDP takes a pragmatic approach and provides a good balance between housing and employment growth opportunity. There needs to be a strong focus on those identified areas for growth in the paper. A good range of different house types and tenures in a range of locations should be supported through the RLDP, taking advantage of available land on the edge of Newport to help to deliver an appropriate scale of growth for the City.</p>	Noted

GSO 020 - Richard Martin - 00849

Question / Response	Officer Response
GROWTH OPTIONS: Growth Scenarios - Are there any scenarios that have been discounted which should be considered further, and why? Which of the options do you feel is the most appropriate, and why? Assessment of Growth Options Against RLDP Objectives - Are there any other matters that should be taken account of when assessing these scenarios and identifying a Preferred Strategy?	
<p>1. No. Lower growth scenarios would not be in line with Welsh Government direction. Higher growth scenarios would be unsustainable and would place unmanageable pressures on infrastructure.</p> <p>2. Option 2 is most likely to achieve sustainable growth over the whole plan period and appears, at this stage of analysis, to imply most positive outcomes and least negative outcomes.</p>	Noted. The Growth Option taken forward is discussed in detail in the Preferred Strategy Cabinet Paper, the Preferred Strategy Consultation Paper and associated Background Papers.
<p>3. There is some evidence tracked in the Annual Monitoring Reports (but not the latest one because of lack of data on multiple deprivation) that the previous plan period of high , housing led growth has been paralleled by a growing deprivation in Newport and a widening social and economic gap between the most deprived areas and the least deprived. Is this an unintended consequence of high housing growth and its location, tenure and affordability or the product of wider forces in the economy and society? Is the issue of social segregation and cohesion a matter for a Local Development Plan - if not, how can this issue be addressed and influenced by the City Council?</p>	Noted, the Preferred Strategy Cabinet Paper, the Preferred Strategy Consultation Paper and associated background papers provide greater detail on this.
SPATIAL OPTIONS: 8. Which of these options do you feel is the most appropriate, and why? 9. Are there any other spatial distributions that should considered, and if so, why? 10. Are there any other matters that should be given consideration when assessing these?	

<p>8. Probably the hybrid option. The Annual Monitoring Report for 2022 indicates that 93% of new homes have been delivered on PDL land. We do not feel that this level of PDL development can be sustained over the future plan period. Also local experience shows that the abnormal costs of developing some PDL land cannot accommodate the required level of Section 106 investment.</p> <p>Whatever spatial option is preferred, our local experience is that due weight must be given to the capacity of the local infrastructure to meet the needs of an increasing population and there should be an explicit assessment of the likelihood that the infrastructure will improve alongside housing growth - if this likelihood is low then well-being objectives will not be met</p> <p>9. A scattered growth option - smaller housing developments in many locations - would not meet the Objectives. A single 'new settlement' is worthy of consideration, depending upon its location, in order to meet a full range of Objectives in one place.</p> <p>10. The report states that '...land availability will need further consideration when determining the preferred spatial option.' The lack of information about land availability, including the list of candidate sites, crucially limits the ability of the general public to assess the options identified. It is accepted that such information will inevitably focus attention on local issues rather than strategic considerations. However it is difficult to assess the differences between the identified spatial options without some general information on land availability and the willingness of landowners and developers to bring it forward. In South Torfaen, the availability of full information about candidate sites has enabled a wide and informed debate about the strategic viability of large scale development in this area adjacent to Newport, as well as raising local implementation issues which are probably not relevant at this stage of plan-making.</p>	<p>Noted. The Spatial Option taken forward is discussed in detail in the Preferred Strategy Cabinet Paper, the Preferred Strategy Consultation Paper and associated background papers.</p> <p>Candidate Site assessments are being carried out as part of a separate process. The results of the Stage 1 assessment can be found in the Candidate Site's Register. Stage 2 of the assessment will be published as part of the Preferred Strategy consultation.</p>
<p>EVIDENCE BASE:</p>	
<p>Q1. Are there any other pieces of evidence that you believe should inform the development of the preferred growth and spatial options strategies?</p> <p>12. Are there any other comments you'd like to make regarding anything within this consultation document? Do you agree with the Objectives for the RLDP? If not, how and why do you think they should be changed?</p>	
<p>11. Is there any empirical evidence about where the people, who have moved to live in the new homes built in the last 10 years, are employed and how they currently travel to work? It is difficult to assess the stated importance of reducing commuting and developing a more self-contained city if we don't know enough about the current base-line and how future housing-led growth will impact on it.</p>	<p>The Demographic Evidence, Employment Land Review (NB not executive summary) detail what key economic factor have been considered.</p>
<p>12. We would support the introduction of a green belt to the north and west of Caerleon, and in other appropriate parts of the city. This provides an essential balance to further housing-led growth. It is vital that the green belt concept is also applied to areas adjacent to the Newport boundary with Caerphilly, Torfaen and Monmouthshire.</p> <p>It is accepted that the spatial options maps are indicative. However, there is strong local feeling that the proposal for a railway station in Caerleon, included in the previous plan, appears to have been dropped. We consider that this issue should remain open for public discussion on the basis of providing a further</p>	<p>Noted</p> <p>The Newport Local Development Plan currently includes policy T1, which supports all proposals for new stations, including a station at Caerleon. The role of the Local Development Plan is to facilitate new and improved stations, but it does not directly allocate these or determine the location of new stations.</p>

<p>important travel option for the local community although we do not consider that the Future Wales statement, that development around new and improved metro stations should be high density and mixed use, is appropriate in the case of every new station, including Caerleon.</p>	<p>As part of this process the LDP team will continue to work with partners, including Welsh Government and Transport for Wales, during the preparation of the replacement LDP to ensure any amendments to policy T1 reflect the opportunities identified by the appropriate transport strategies and that our development strategy seeks to support the delivery of strategic and local transport improvements.</p>
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GSO 021 - Councillor Stephen Cocks - 00737

Question / Response	Officer Response
<p>Growth Options Growth Scenarios - 1 Are there any scenarios that have been discounted which should be considered further, and why? Which of the options do you feel is the most appropriate, and why? Assessment of Growth Options Against RLDP Objectives - Are there any other matters that should be taken account of when assessing these scenarios and identifying a Preferred Strategy?</p>	
<p>Newport is a town in need of regeneration. The decline of the city's industrial base, together with years of austerity has resulted in a decline in social and economic wellbeing and a decline in the physical environment. Economic growth is vital and this favours job creation. However, there needs to be a balance between dwellings and jobs. A high proportion of houses to jobs will increase commuting. There is already a growing trend on people moving into Newport who work in England. Transport issues should play a far greater part in the replacement plan. Newport is the site of what is recognised as Wales' more serious road traffic congestion issue, on the M4. This is a major issue locally, but also nationally. It undoubtedly impacts on the attractiveness of Newport and South Wales as a business location. It also has a major environmental impact, particularly in relation to air pollution. It is difficult to understand why no scenario does not rate transport as red. The most appropriate options are 2 or 3.</p>	<p>Noted. The Growth Option taken forward is discussed in detail in the Preferred Strategy Cabinet Paper, the Preferred Strategy Consultation Paper and associated Background Papers.</p> <p>As part of this process the LDP team will continue to work with partners, including Welsh Government and Transport for Wales, during the preparation of the replacement LDP to ensure policy reflect the opportunities identified by the appropriate transport strategies and that our development strategy seeks to support the delivery of strategic and local transport improvements.</p>
<p>Employment Land options Recommendation One - 4. Is this requirement appropriate for Newport? 5. Should it be different and if so, why? Recommendation Two - 6. Should some sites be removed from the employment supply? Why?</p>	

7. Should alternative land uses be considered for some sites? Please provide examples of such uses and your rationale for this.	
Adequate land needs to be earmarked to accommodate forecast growth, but any surplus should be assigned to enhancing Newport's physical environment. In particular there is a need to enhance many urban areas with green spaces. Some areas are dominated by old unattractive buildings and derelict industrial land. Newport should be a much greener city. The above favours recommendation 2.	Noted. The Growth Option taken forward is discussed in detail in the Preferred Strategy Cabinet Paper, the Preferred Strategy Consultation Paper and associated Background Papers.
Spatial Options	
8. Which of these options do you feel is the most appropriate, and why?	
9. Are there any other spatial distributions that should be considered, and if so, why?	
10. Are there any other matters that should be given consideration when assessing these?	
It is difficult to see how one approach will be appropriate to all locations and a hybrid model seems most appropriate. Transport issues will need to be a key part of decision making if commuting by car is not to increase.	Noted. The Spatial Option taken forward is discussed in detail in the Preferred Strategy Cabinet Paper, the Preferred Strategy Consultation Paper and associated background papers.
Evidence base	
11. Are there any other pieces of evidence that you believe should inform the development of the preferred growth and spatial options strategies?	
12. Are there any other comments you'd like to make regarding anything within this consultation document? Do you agree with the Objectives for the RLDP? If not, how and why do you think they should be changed?	
Transport needs to have much more prominence in the plan. The Burns Report includes some very welcome developments, particularly in relation to active travel. However, none of its proposals will solve the issue of congestion on the M4. On the contrary, growth plans will exacerbate the problem. Rail travel in particular should be made much easier. There needs to be a commitment to expanding the network of railway stations. There are already proposals for stations in such locations as Magor, Llanwern, Celtic Springs etc. There should also be a commitment to a station in Caerleon, preferably on the current St Cadocs site. This is an ideal location for a "walkway", active travel site and would serve a population which overwhelmingly commutes to work.	Noted. The role of the Local Development Plan is to facilitate new and improved stations, but it does not directly allocate these or determine the location of new stations. As part of this process the LDP team will continue to work with partners, including Welsh Government and Transport for Wales, during the preparation of the replacement LDP to ensure any amendments to policy T1 reflect the opportunities identified by the appropriate transport strategies and that our development strategy seeks to support the delivery of strategic and local transport improvements.
Newport's heritage also needs greater consideration within the plan. Newport has an unrivalled heritage offer. There needs to be consideration of the impact of making the city attractive to tourists. Caerleon has what are probably the best Roman remains in the UK. Cadw is undertaking a scoping exercise to develop the site which will potentially draw in tens of thousands of visitors each year. Traffic is already a major problem in Caerleon. A railway station will be essential. Another urgent need will be to identify land for parking outside the village centre.	The Growth options have been a high level in relation to their contribution to the emerging objectives of the plan, including: "Historic Environment- To preserve, enhance and realise the value of Newport's heritage resources, through investment,

	<p>interpretation and maximisation of those opportunities provided by the distinctive historic environment and archaeological assets.”</p> <p>The issues of the historic environment will be considered in further detail as the plan progresses.</p>
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GSO 022 - Glamorgan Gwent Archaeological Trust - 00063

Question / Response	Officer Response
<p>You will be aware that we are retained by your Authority to give advice to you regarding archaeology and the historic environment, through our archaeological planning team and the heritage management team. Newport have adopted the Historic Environment Record which is curated by this Trust and holds data on the historic environment for south east Wales.</p> <p>The document acknowledges the existing policies within both national Welsh Government and local government relating to archaeology and the historic environment. The Growth Options have been assessed against the RLDP Objectives and these include the Historic Environment; the assessment is undertaken with reference to the Well-being goals as well as the key Planning Principles. However, this assessment appears not to have taken into account that some Historic Assets are Statutorily Protected, and have a National level of protection. These include Listed Buildings, Scheduled Monuments, Registered Parks and Gardens, and Registered Landscapes. To add to these, there are at least 2,169 sites, features and artefacts noted within Newport's boundary noted on the Historic Environment Record; the much larger proportion of known assets are not statutorily protected. The document states: High growth scenarios may result in pressure to increase density of development or locate it in areas which could negatively impact on the setting of historic assets/landscapes. However, it does not consider that there may be a physical impact on the historic assets and landscapes, or that the impacts would require mitigation.</p> <p>Likewise, the Spatial Options have been assessed using the same process, resulting in the result that the options May place undue pressure on the preservation of historic assets within the countryside due to the levels of growth required.</p> <p>The origins of Newport as a current city primarily lie in the Roman, Medieval and post-Medieval periods, relating to maritime transport and trading, military and defensive aspects of settlement and industry and transport as well as religious and secular buildings. These have contributed to the current form and layout of the city and its environs. The areas of the Wentlooge, Mendalgief and Caldicot Levels, which are a Registered Landscape, are an important part of the historic environment within Newport's boundaries, and continuing into adjacent Authorities.</p>	<p>Noted. The Growth and Spatial Options taken forward is discussed in detail in the Preferred Strategy Cabinet Paper, the Preferred Strategy Consultation Paper and associated Background Papers.</p>

<p>As previously noted, current legislation and policy is supported by the TAN24: the Historic Environment and a series of best practice guidance on managing change in the historic environment. Awareness of the archaeological and built heritage resource ensures identification of opportunities to mitigate impact prior to or during development, and also potential for enhancement and protection by design. It is our opinion that the impact of Growth and Spatial Options will have both physical and setting impact on historic assets and areas, both with and without statutory protection. The understanding and management of the Historic Environment has additional beneficial factors and contributes more widely to the Well-being goals than listed in the document.</p> <p>Regarding the historic environment and climate change Climate Change/Cadw (gov.wales) has details which provide further information for proactive working, and the Welsh Archaeological Trusts have been undertaking Cadw funded projects to identify and monitor change. Proposed changes (including proposed development and land management) affecting the historic environment can best be mitigated by early consultation with us as your Authority's archaeological advisors. Factors from a historic environment aspect which may cause risk are change from both physical and development means, on a large scale or as accumulative impact from smaller events.</p> <p>It is also important to recognise that Planning Policy Wales refers to historic assets, including buried archaeological remains and built heritage, being preserved in situ as a priority, and preserved by record if preservation in situ cannot be achieved.</p> <p>All archaeological work, including that undertaken to assess change in which may impact the historic environment, should be undertaken to the Standards and Guidance of the Chartered Institute for Archaeologists. It is our policy to recommend that all work is undertaken either by a Registered Organisation (RO) with the CIfA or by a MCIfA accredited member.</p>	
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GSO 023 - B&K Futures & Bron Afon - 00647

Question / Response	Officer Response
<p>We make representations on behalf of our client, B&K Futures in response to the Newport Replacement Local Development Plan (RLDP) Growth and Spatial Options consultation paper. Our client has an interest in land at Marshfield Road, Castleton, which has been submitted as a Candidate Site. The land offers a logical development opportunity to deliver approximately 30 dwellings, including affordable homes, in a highly suitable and sustainability location contained within the existing built form of Castleton and within close proximity of Marshfield Primary School, Castleton Pre-School and Castleton and District Village Hall. Our client is an experienced developer and has good working relationships with Affordable Housing providers including Bronafon Housing Association.</p>	<p>Candidate Site assessments are being carried out as part of a separate process. The results of the Stage 1 assessment can be found in the Candidate Site's Register. Stage 2 of the assessment will be published as part of the Preferred Strategy consultation stage.</p>

<p>Our client’s response to the Growth and Spatial Options is set out below. In summary we consider that in line with national policy objectives and Newport’s strategic role as an area of growth in south east Wales, a higher number of homes should be sought through the RLDP including non strategic greenfield sites in sustainable locations, such as our client’s land, that can be delivered quickly.</p> <p>Our client would be willing to discuss the development opportunity further along with a programme for delivery.</p>	
<p>GROWTH OPTIONS: Growth Scenarios - 1. Are there any scenarios that have been discounted which should be considered further, and why?</p>	
<p>We consider that it is entirely appropriate to discount the low growth options. In this regard, Policy 33 of Future Wales states that the Welsh Government support an “increased strategic role” for Newport which suggests that the continuation of the status quo i.e. existing levels of growth would also not be appropriate. Accordingly, enhanced levels of growth beyond the current LDP strategy are required.</p> <p>Table 1 provides a useful point of reference for establishing how an increased strategic role may be facilitated. Clearly in order to comply with Future Wales the Plan requires a level of growth that is at the very least equal to or greater than the current LDP level of growth, as such it cannot be justified removing the PG Short Term level of growth. Whilst they are very similar, this along with the Dwelling Led 5yr level are the only two approaches that would seek a higher level of growth than is presently the case and therefore comply with Future Wales, all of the others would imply a reduced strategic role.</p>	<p>Noted. The Growth Option taken forward is discussed in detail in the Preferred Strategy Cabinet Paper, the Preferred Strategy Consultation Paper and associated Background Papers.</p>
<p>2. Which of the options do you feel is the most appropriate, and why?</p>	
<p>It is clear that the only two options that are appropriate, in line with Future Wales and an increased Strategic Role for Newport are those that are higher than the existing LDP level and in this regard we strongly believe that the Dwelling Led 5yr level is the most appropriate. It is clear that Future Wales anticipates Newport growing with an increased strategic role for the city. As such it is key that an aspirational level of growth is sought that seeks to drive the increase the strategic role that Newport plays and drive the regional economy.</p> <p>There are numerous factors providing the context for the level of growth sought which we believe point towards the higher levels. We set these out summarily below but note their importance in a higher growth requirement.</p>	<p>Noted. The Growth Option taken forward is discussed in detail in the Preferred Strategy Cabinet Paper, the Preferred Strategy Consultation Paper and associated Background Papers.</p>
<p><u>Post Covid 19 recovery, energy crisis and Brexit</u> It is clear that Newport faces significant challenges in order to achieve an increased strategic role in the context of the post Covid economy, Brexit Recovery and the ongoing energy crisis. We are strongly of the view that the planning process must play its part in helping to facilitate the economic recovery that is</p>	<p>Noted. The Growth Option taken forward is discussed in detail in the Preferred Strategy Cabinet Paper, the Preferred Strategy Consultation Paper and associated Background Papers.</p>

<p>needed. Plainly economic recovery must form an over-riding requirement of the plan and without question must underlie the approach to be taken. An appropriate response to achieve an increased strategic role would be to plan for higher levels of growth than over recent plan periods.</p>	
<p><u>Constraints in adjoining Authorities</u> In addition to meeting its own needs the Council will need to consider the lack of housing supply in neighbouring Authorities. Future Wales is also clear that “Growth at Newport will help manage the development pressures in the region by providing a strategic growth focus for the eastern part of the area”. Newport has not just been dealing with its own needs in recent years and accordingly needs to consider the offsets from new homes not being provided in its neighbouring authorities. Whilst housing land supply requirements were formally abandoned by the Welsh Government, it does not change the record of poor delivery elsewhere and it follows logically that where needs aren’t met within an Authority, they will need to be accommodated somewhere. Whilst this is an unsatisfactory and unsustainable position there is unlikely to be any change in this in the short term. Notably:</p> <ul style="list-style-type: none"> - Torfaen & Caerphilly – as of April 2021 there was a cumulative shortfall across the two Authorities of over 4,000 dwellings from the levels envisaged within their respective Local Development Plans. This represents the number of households that could not be provided in those respective Authorities. This is a shortfall of national significance that has a profound effect on house prices across the region; and Monmouthshire – representations made by the Welsh Government on the Monmouthshire LDP mean fewer new housing allocations as it is not an identified area of growth. Given the additional constraints in Monmouthshire, including Phosphates, it is likely that demand will be displaced from Monmouthshire to adjoining Authorities. <p>Therefore policy and supply constraints in adjoining Authorities will have a significant impact upon Newport Council in respect of the housing market and affordability issues. This is a challenge that the LDP respond to with higher growth rates than previous years in order to achieve an increased strategic role.</p>	<p>Noted. NCC is supportive of cross council working and joint working and effectively tackling cross boundary issues.</p> <p>The Growth Option taken forward is discussed in detail in the Preferred Strategy Cabinet Paper, the Preferred Strategy Consultation Paper and associated Background Papers.</p>
<p><u>Meeting needs</u> It will be of utmost importance to ensure Newport establishes a level of growth that meets needs and does not exacerbate the existing supply constraints in South Wales, taking into consideration the shortfalls in adjoining Authorities alongside Newport’s own needs. Rather we are of the view that the highest level of growth will need to be set in order to meet the Vision and fulfil the strategic aspirations for Newport as a Gateway City to Wales. In this regard it is noted that:</p>	<p>Noted. The Growth Option taken forward is discussed in detail in the Preferred Strategy Cabinet Paper, the Preferred Strategy Consultation Paper and associated Background Papers.</p>

<ul style="list-style-type: none"> • given the potential impacts of Covid 19 on the economy and society, there will be a need to adopt a highly ambitious strategy which provides far greater flexibility to respond to the crisis through added stimulation of the construction sector; • account should be taken in the baseline figures of the levels of sustainability and selfcontainment that can be achieved through embracing working from home trends for those sectors where it is feasible. These are often the high added value jobs that are no longer tied to cities such as Bristol or Cardiff but can retain expenditure in the local area and encourage vibrant local areas; and • any requirement should ensure an appropriate level of flexibility for delivery indeed, it may be that a 20% flexibility allowance or greater provides an appropriate starting point. We will comment on this further when detailed information becomes available. 	
<p><u>Addressing affordability</u></p> <p>The Council's result in nearly achieving its affordable housing target for 2015-2020 is to be welcomed. However, the Council recognise that this is only a small proportion of the actual level of need. The latest Local Housing Market Assessment (LHMA) indicates that "as of the 31st March 2017 there were 6,838 households with active applications on the housing waiting list. In order to clear this backlog during the 5 year life of this LHMA we would need to allocate 1,368 units of accommodation each year". The final stated annual shortfall is 559 per annum which equates to 2,795 over the five year period. This is plainly a significant issue within the Authority which has no doubt been exacerbated by price increases that have been caused due to shortages of housing supply outside of the County.</p> <p>Our clients are of the view that the replacement LDP provides an opportunity to seek to address affordability in a meaningful and substantive way.</p>	Noted
<p>3. Are there any other matters that should be taken account of when assessing these scenarios and identifying a Preferred Strategy?</p>	
<p>We have considered the assessment of each of the options and have commented where we believe that the assessment could be reviewed. Importantly, with regards to the lower growth options that are considered (options 2 to 6) in the first instance, we do not believe that these will contribute towards the Future Wales aim for Newport to have an increased Strategic Role in South Wales, this should form part of the assessment.</p>	Noted. The Growth Option taken forward is discussed in detail in the Preferred Strategy Cabinet Paper, the Preferred Strategy Consultation Paper and associated Background Papers.
<p><u>Option 1: 12,570 new homes and 12,945 jobs</u></p> <p>With regards to the higher growth option we have suggested that a number of the "colours" should be improved based on the potential for positive outcomes. Indeed, greater levels of investment in line with an Increased Strategic Role for Newport would have the potential to bring many significant benefits across the assessment areas. We are strongly of the view that this is the only option that would allow Newport to strive towards an increased Strategic Role in line with Future Wales.</p> <p>Our analysis is below.</p>	This assessment was produced for the purpose of the Growth and Spatial Options consultation, however the Integrated Sustainability Appraisal (ISA) assesses these in more detail.

Economy & Employment	We support the overall conclusions of this assessment
Population & Communities	We support the overall conclusions of this assessment
Health & Well Being	We support the overall conclusions of this assessment
Equality, Diversity and Inclusion	We support the overall conclusions of this assessment
Transport & Movement	<p>Newport has been identified as a location for growth within Future Wales specifically because it is a sustainable location for growth. Its communities are well connected to public transport and well served by facilities. With specific reference to Castleton, it benefits from bus services between Newport and Cardiff in both directions along the A48. There are also cycle links and both city edges of Newport and Cardiff are within a 20 minute cycle distance. Major employment areas are able to be reached within this 20 minute cycle range.</p> <p>We note that it is indicated that more opportunities for investment could be apparent under high scenarios, we believe that the Council's assessment should be more positive on this – indeed, higher levels of growth would enable a step change in investment and enhancement that could be a significant benefit. This should be re-assessed as green. Indeed, this is far more likely to be the case than for small scale, incremental and piecemeal infill development and ad-hoc brownfield sites.</p>
Natural Resources	<p>We are surprised by the comments set out herein, it is noted that water consumption would increase for all options however, there are sustainable means of managing this.</p> <p>Much of the landscape surrounding Newport (where it is not at risk of flooding) is heavily influenced by negative urban impacts.</p> <p>We also support the notion that greater investment brings the potential for more sustainable lifestyles, as greater facilities would exist and as construction techniques evolve and progress.</p> <p>We are strongly of the view that with appropriate planning interventions, this could be at least an orange category if not green.</p>
Biodiversity and Geodiversity	Again the categorisation red seems inappropriate (Option 5 and 6 are green) yet brownfield sites have equal (if not greater) chance of disturbing habitats and actually being unable to adequately mitigate.

	There is significant opportunity to provide ecological enhancement and net gain from greenfield sites.	
Historic Environment	We would note that each case would need to be dealt with based on its own merits, albeit there are more heritage assets (including Listed Buildings and Conservation Areas) within the urban area than there are in surrounding green fields.	
Landscape	As noted earlier much of the landscape surrounding Newport (where it is not at risk of flooding) is heavily influenced by negative urban impacts.	
Climate change	With regards to Flooding, there are considerable issues for existing properties in Newport, growth means higher investment and the potential to contribute towards solving existing problems. Increased investment in local facilities would mean potentially increasing sustainability. A higher growth strategy will actively prevent growth being dispersed. Indeed, low growth means that people would “jump” the green belt – leading to greater in commuting or travel to Bristol and Cardiff	

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With regards to the remaining options, we note:
Option 2: 9,450 new homes and 10,695 Jobs & Option 3: 9,570 new homes and 8,640 jobs
 Given the similar scale of growth we consider both options in the following table in order to minimise duplication. It is noted in the first instance that these would be contrary to the Future Wales aspiration for Newport to achieve an increased strategic role.

This assessment was produced for the purpose of the Growth and Spatial Options consultation, however the Integrated Sustainability Appraisal (ISA) assesses these in more detail.

Economy & Employment	We support the overall conclusions of this assessment
Population & Communities	We support the overall conclusions of this assessment
Health & Well Being	We support the overall conclusions of this assessment
Equality, Diversity and Inclusion	We support the overall conclusions of this assessment
Transport & Movement	We support the overall conclusions of this assessment for both options.
Natural Resources	As with option 1, we are surprised by the comments set out herein, it is noted that water consumption would increase for all options however, there are sustainable means of managing this. In addition, much of the landscape surrounding Newport (where it is not at risk of flooding) is heavily influenced by negative urban not at risk of flooding) is heavily influenced by negative urban impacts.

	<p>We also support the notion that greater investment brings the potential for more sustainable lifestyles, as greater facilities would exist and as construction techniques evolve and progress.</p> <p>We are strongly of the view that with appropriate planning interventions, this could be at least an orange category if not green.</p>	
Biodiversity and Geodiversity	<p>Again the categorisation seems inappropriate (Option 5 and 6 are green) yet brownfield sites have equal (if not greater) chance of disturbing habitats and actually being unable to adequately mitigate.</p> <p>There is significant opportunity to provide ecological enhancement and net gain from greenfield sites.</p>	
Historic Environment	<p>It is unclear why options 2 and 3 are scored differently</p> <p>We would note that each case would need to be dealt with based on its own merits, albeit there are more heritage assets (including Listed Buildings and Conservation Areas) within the urban area than there are in surrounding greenfield.</p>	
Landscape	<p>We support the overall conclusions of this assessment</p>	
Climate change	<p>With regards to flooding, there are considerable issues for existing properties in Newport, growth means higher investment and the Increased investment in local facilities would mean potentially potential to contribute towards solving existing problems increasing sustainability.</p> <p>A higher growth strategy will actively prevent growth being dispersed.</p> <p>Indeed, low growth means that people would “jump” the green belt – leading to greater in commuting or travel to Bristol and Cardiff.</p>	
<p><u>Option 4: 7,950 new homes and 9,405 Jobs, Option 5: 8,100 new homes and 6,720 jobs & Option 6: 7,605 new homes and 5,835 jobs</u></p> <p>Given that Options 4, 5 and 6 and low growth options with broadly similar levels of new homes, we set out our combined comments on these options below in order to avoid duplication. It is noted in the first instance that these would be contrary to the Future Wales aspiration for Newport to achieve an increased strategic role</p>		<p>This assessment was produced for the purpose of the Growth and Spatial Options consultation, however the Integrated Sustainability Appraisal (ISA) assesses these in more detail.</p>
Economy & Employment	<p>We are of the view that these low growth options should all be categorised as red as they would not provide the combination of jobs and homes required to provide an increased strategic role for Newport</p>	
Population & Communities	<p>We are of the view that these low growth options should all be categorised as red as they would not provide the combination of jobs and homes required to provide an increased strategic role for Newport</p>	

Health & Well Being	At the lower scales of growth these options are unlikely to provide the investment required in such facilities rather it would be a continuation of existing levels.	
Equality, Diversity and Inclusion	We support the overall conclusions of this assessment however, question whether this should be red given the importance of meeting needs.	
Transport & Movement	With each option there would be fewer opportunities for significant levels of investment in improved infrastructure or sustainable means of travel.	
Natural Resources	It is clear that lower growth levels would require less greenfield land which would clearly result in a continuation of the existing urban / rural interface. However, there are areas that could benefit from new landscaping / planting to soften the interface and provide visual benefits in this regard.	
Biodiversity and Geodiversity	The categorisation seems in appropriate and it is unclear why options 5 and 6 are green yet brownfield sites have equal (if not greater) chance of disturbing habitats and actually being unable to adequately mitigate due to more limited land availability on site. They do not have the same level of opportunity to provide ecological enhancement and net gain as greenfield sites.	
Historic Environment	We would note that each case would need to be dealt with based on its own merits, albeit there are more heritage assets (including Listed Buildings and Conservation Areas) within the urban area than there are in surrounding greenfield.	
Landscape	It is clear that lower growth levels would require less greenfield land which would clearly result in a continuation of the existing urban / rural interface. However, there are areas that could benefit from new landscaping / planting to soften the interface and provide visual benefits in this regard.	
Climate change	With regards to Flooding, there are considerable issues for existing properties in Newport, growth means higher investment and the potential to contribute towards solving existing problems. There would potentially be less investment in sustainability. Lower growth is likely to contribute towards increased commuting whereby people would be priced out of the local market and “jump” the greenbelt to alternative locations where homes are available.	

EMPLOYMENT LAND OPTIONS:	
Recommendation One -	
4. Is this requirement appropriate for Newport?	
We are supportive of the recommendations of the Employment Land Review which seek to protect 157.8 ha of supply in order to achieve the 77ha requirement. We believe that this approach provides flexibility to achieve the Future Wales approach towards increasing the Strategic Role of Newport.	Noted
5. Should it be different and if so, why?	
As noted above, we support the recommendations of the Employment Land Review.	Noted
Recommendation Two -	
6. Should some sites be removed from the employment supply? Why?	
The Employment Land Review recommends that all the sites listed in Table E1 of the Executive Summary are retained within the RLDP, this includes both the Solutia Site and Queensway Meadows, therefore it is unclear why their removal is being considered, further clarity over this would be required in order for us to consider further. It is noted that if Newport is to achieve its increased Strategic Role, it is imperative that it is providing a balance of jobs and homes and a significant supply of deliverable land for both purposes is available.	Noted. The Employment Land Review (NB not executive summary) discusses this in more detail, including the recommendations regarding East of Queensway Meadows at section 8.8.
7. Should alternative land uses be considered for some sites? Please provide examples of such uses and your rationale for this.	
Given our response to question 6, we have no further comments on this question.	Noted
SPATIAL OPTIONS:	
8. Which of these options do you feel is the most appropriate, and why?	
We consider that in order to deliver the level of growth required, the Urban Expansion option provides an important focus. That said, a Hybrid of options should be taken forward as for instance an element of Village Focus will be key as it will be important for each community to be able to cater for its own needs and support its community facilities, such as schools, through a proportionate amount of growth. This will ensure a sustainable future for those settlements, including Castleton.	Noted. The Spatial Option taken forward is discussed in detail in the Preferred Strategy Cabinet Paper, the Preferred Strategy Consultation Paper and associated Background Papers.
9. Are there any other spatial distribution options that should be considered, and if so, why?	
A hybrid combination of options will be required in order to achieve the growth required. We do not necessarily suggest an alternative option that has not already been considered, however, what will be important before formulating a preferred option is understanding the deliverability of candidate sites put forward. Smaller greenfield sites, such as our client's land, will provide the benefit of being able to be delivered early in the plan period without the requirement for significant new infrastructure.	Noted. Candidate Site assessments are being carried out as part of a separate process. The results of the Stage 1 assessment can be found in the Candidate Site's Register. Stage 2 of the assessment will be published as part of the Preferred Strategy consultation.
10. Are there any other matters that should be given consideration when assessing these?	

<p>In supporting our assessment of both the highest growth option and spatial approach which requires greenfield land, we set out below a number of key considerations in the benefits that they can bring. In particular in helping Newport to achieve and increased strategic role but also in terms of the other key assessment areas.</p>	<p>Noted</p>
<p><u>Sustainable urban extensions</u></p> <p>Our clients are of the view that it will be important to consider all scales of potential development from minor rounding off of settlements and infill to sustainable urban extensions in line with Future Wales. Indeed, the Welsh Government’s guidance, “Building Better Places” actively seeks to achieve rounded communities based on the underlying principles of place making.</p> <p>The Town and Country Planning Association (TCPA) indicates that the full range of planning solutions should be available to communities in order to achieve “the most sustainable pattern of development locally”. Guidance set out by the TCPA indicates that holistically planned urban extensions can enhance the natural environment and offer high-quality affordable housing and locally accessible work in beautiful, healthy and sociable communities. Such interventions could be exemplars in sustainability and energy efficiency.</p> <p>The TCPA also note that “Major planned developments such asurban extensions provide an opportunity to design-in the greenest of technologies and infrastructure from scratch, in ways that are not possible in smaller infill schemes”. Such schemes can set a benchmark in quality and approach that can lead the way for smaller schemes elsewhere in the country.</p> <p>Appropriately sized and scaled urban extensions provide the opportunity for new development to positively address existing issues by creating a planned environment to suit and cater for a critical mass of population, services and facilities. These can:</p> <ul style="list-style-type: none"> • include a variety of housing types, tenures and densities along with neighbourhood centres with mixed uses and a range of facilities; • provide a landscape structure that builds on existing assets, including green infrastructure within the development, linking urban areas to the countryside beyond and creating a distinctive edge to the urban area; • provide opportunities for people to work locally and for small businesses to set up, grow and thrive; • present an opportunity to design energy efficient communities; • allow pedestrian, cycle and public transport networks to be fully integrated, often improving services available to the adjacent communities, increasing health and well-being by reducing the reliance on cars; and • support the surrounding communities by offering facilities not available locally and by providing affordable housing for people in the care and support sectors they can ensure that the elderly can continue to live independently amongst friends and family reducing the costs of providing social and nursing care. 	<p>Noted</p> <p>Noted. The Deposit Plan will include reviewed urban and village boundaries and green wedge designations.</p>

<p>These concepts are best delivered through consideration of longer term time horizons and wider geographical areas so that the benefits of strategic solutions are explored. The alternative of short term, small scale, incremental and dispersed change will not yield the same overall benefits. Importantly, by applying a coherent and distinctive urban design concept and master planned approach that combines innovative solutions and reflection of local characteristics, such extensions can provide the opportunity to create a new development that has a strong local identity. This will facilitate effective integration with the existing community for whom there should be major benefits particularly in relation to supporting the existing economy and creating jobs but also in the provision of a range of housing sizes, styles and tenures to accommodate those currently priced out of the local housing market. This accords with a wide range of national planning policy requirements.</p>	
<p><u>Sustainable growth locations</u> It is inevitably the case that the supply of brownfield sites in Newport for redevelopment for residential purposes is limited. As such, the Council will need to consider sustainable and appropriate greenfield locations based around existing communities. In reality, this is likely to focus on the western and north western parts of the County extents associated with existing built form and communities. Indeed, we are of the view that the LDP must not neglect the requirements of these existing communities in favour of more remote areas on the Eastern side of the city that would be more aligned to commuting patterns along the M4.</p> <p>It is anticipated that such focal points for proportionate growth include a number of existing communities where there are a number of local facilities that can provide an opportunity to maximise levels of self-containment and sustainability. Indeed, proportionate growth can help to reinforce existing levels of sustainability but also seek to provide additional facilities and uses that can move to a greater level of neighbourhood and community well-being. In this regard, our clients consider that Bettws and Rogerstone are suitable locations to accommodate further sustainable growth.</p>	<p>Noted. The deposit plan will include reviewed urban and village boundaries.</p>
<p><u>Castleton</u> Castleton is a very sustainable local settlement located partway between the Cities of Newport and Cardiff. It provides a range of existing facilities and is considered to be highly appropriate for proportionate small scale extensions and infill development in order to help provide affordable homes. Indeed, there is considered to be a significant need for more affordable properties to help ensure a more balanced community.</p> <p>It is notable there is a wide range of local services and facilities that would ensure it is a suitable location for additional provision of homes:</p> <ul style="list-style-type: none"> • Castleton and District Village Hall • Marshfield Primary School • Castleton Baptist Church Fellowship • Petrol Station 	<p>Noted. The Deposit Plan will include reviewed urban and village boundaries and green wedge designations. A village appraisal is provided in the Settlement Assessment Background Paper.</p>

<ul style="list-style-type: none"> • Convenience Store • Motor Vehicle Garage • Premier Inn Hotel • Coach and Horses Restaurant and Pub <p>Furthermore, it is located along sustainable public transport routes with bus stops run along Marshfield Road. These stops serve bus route 30, which operates between Cardiff and Newport via Old St Mellons, Castleton and Tredegar Park. This provides 28 services per day between Monday and Friday, 26 services on Saturdays and 10 services on Sundays.</p> <p>Summarily, it is clear that at the local scale a general level of self containment and walking can be achieved and more strategically it is well placed in respect of public transport routes. Small scale expansion with proportionate affordable homes that do not impact upon landscape constraints (in particular coalescence with Cardiff) should be explored and encouraged.</p>	
EVIDENCE BASE:	
11. Are there any other pieces of evidence that you believe should inform the development of the preferred growth and spatial options strategies?	
<p>It is noted that only limited evidence is currently available and it is clear that there will be a need to publish significantly more evidence in respect of matters such as supply of housing land.</p>	<p>Noted</p>
12. Are there any other comments you'd like to make regarding anything within this consultation document? Do you agree with the Objectives for the RLDP? If not, how and why do you think they should be changed?	
<p>On general terms we are supportive of the overall approach towards the objectives, however, we believe that particular attention is needed with regards to economic and population / community objectives. As we have stated earlier, there are significant challenges ahead and it must be the role of the planning process to help address these issues rather than constrain recovery and realignment.</p> <p>We are strongly of the view that well planned urban extensions can contribute towards a range of the key objectives not just in respect of population and communities, inclusive of:</p> <ul style="list-style-type: none"> • including a variety of housing types, tenures and densities along with neighbourhood centres with mixed uses and a range of facilities; • providing a landscape structure that builds on existing assets, including green infrastructure within the development, linking urban areas to the countryside beyond and creating a distinctive edge to the urban area; • providing opportunities for people to work locally and for small businesses to set up, grow and thrive; • presenting an opportunity to design energy efficient communities; • allowing pedestrian, cycle and public transport networks to be fully integrated, often improving services available to the adjacent communities, increasing health and well-being by reducing the reliance on cars; and 	<p>Noted. The Deposit Plan will include reviewed urban and village boundaries and green wedge designations.</p>

<ul style="list-style-type: none"> • supporting the surrounding communities by offering facilities not available locally and by providing affordable housing for people in the care and support sectors they can ensure that the elderly can continue to live independently amongst friends and family reducing the costs of providing social and nursing care. 	
<p>Other comments</p> <p>Our client has development experience and working relationships with affordable housing providers, including Bronafon Housing Association. Our client would welcome engagement with the Council to discuss the opportunity in Castleton in further detail and the role the site can play in the delivery of sustainable development through the replacement LDP.</p>	Noted

GSO 024 - Barratt David Wilson Homes (Bettws Hill - 00173

Question / Response	Officer Response
<p>Growth Options - part 1</p> <p>Growth Scenarios</p> <p>1. Are there any scenarios that have been discounted which should be considered further, and why,</p> <p>2. Which of the options do you feel is the most appropriate, and why, Assessment of Growth Options Against RLDP Objectives</p> <p>3. Are there any other matters that should be taken account of when assessing these scenarios and identifying a Preferred Strategy,</p>	
<p>Background</p> <p>Chapter 3 of the Growth and Spatial Options Document presents and seeks feedback on a series of growth scenarios which would in turn inform the housing requirement and the number of jobs to be planned for (which in turn would derive the employment land requirement). Initially, 12 scenarios are presented in Table 1 with Table 2 further refining this down to six Growth Options as the employment-led scenarios and those scenarios that would result in low levels of growth have been removed. As part of the Call for Sites in August and September 2021, Barratt David Wilson Homes submitted the site known as 'Land at Bettws Hill' (CS0045). The submission was comprehensive and included an extensive package of documentation aimed at demonstrating environmental and technical acceptability and performance.</p> <p>Given Barratt David Wilson Homes interest within Newport, the Growth Strategy is only relevant in so much as it informs the housing requirement with matters relating to the number of jobs to be planned (and associated employment land requirement) not of relevance.</p> <p>Context</p> <p>National planning policy is clear as to how a housing requirement should be formulated with Paragraph 4.2.6 of Planning Policy Wales Edition 11 (February 2021) stating that:</p> <p>'The latest Welsh Government local authority level Household Projections for Wales, alongside the latest Local Housing Market Assessment (LHMA) and the Well-being plan for a plan area, will form a</p>	<p>Noted. Candidate Site assessments are being carried out as part of a separate process. The results of the Stage 1 assessment can be found in the Candidate Site's Register. Stage 2 of the assessment will be published as part of the Preferred Strategy consultation.</p>

<p>fundamental part of the evidence base for development plans. These should be considered together with other key evidence in relation to issues such as what the plan is seeking to achieve, links between homes and jobs, the need for affordable housing, Welsh language considerations and the deliverability of the plan, in order to identify an appropriate strategy for the delivery of housing in the plan area. Appropriate consideration must also be given to the wider social, economic, environmental and cultural factors in a plan area in order to ensure the creation of sustainable places and cohesive communities.'</p> <p>From the above text it is clear that-</p> <ol style="list-style-type: none"> 1. Household projections should be used as the starting point for establishing the housing requirement; but that 2. Other elements of the evidence base should also underpin the housing requirement; and that also 3. The wider political, economic, social, and environmental context, combined with what the Local Planning authority (LPA) want the Replacement Local Development Plan (RLDP) to achieve, should be considered. 	
<p><u>Point 1 - Household Projections</u></p> <p>Barratt David Wilson Homes suggest that the correct projection to use is the WG-2018- HIGHPOP (Growth Option 2). The reason for this is that, unlike the WG-2018-Principal or the WG-2018-LOWPOP projections, it is re-based to the 2021 Census.</p> <p>This is the right starting point because it makes use of the most recent set of household projections (2018-based) whilst responding to the actual findings of the 2021 Census which provide an incredibly accurate snapshot in time that is more recent than the 2018-based projections. Put another way, it reflects the actual position on the ground, and the projections associated with it, at a fixed point in time rather than a wholly projected scenario.</p> <p>This is particularly important in the case of Newport City Council (NCC) where there is a significant under estimation of the position compared to the actual findings of the 2021 Census. This is articulated in the 'LDP Demographics' Paper prepared by Edge Analytics on behalf of Newport City Council which at Paragraph 2.25 states that-</p> <p>'Newport has seen the largest population increase between the 2020 MYE and 2021 Census population compared to other Welsh authorities (2.0%) (Figure 20). Only two out of the 22 Welsh authorities have seen an increase between the two population figures (Powys and Newport), with the rest of the authorities showing population declines.'</p> <p>Taking the above together, it would be the right approach for LPAs, in general, to use the WG-2018- HIGHPOP going forward and this is particularly important for an LPA such as NCC where there is a significant diversion between the 2018-based projections and the 2021 Census.</p>	<p>Noted. The Growth Option taken forward is discussed in detail in the Preferred Strategy Cabinet Paper, the Preferred Strategy Consultation Paper and associated Background Papers.</p>

Point 2 - Evidence Base Elements

Two of the options presented in Table 2 of the Growth and Spatial Options Document are the PG-Short Term and PG-Long Term scenarios (the PG-Long Term is also presented as a Growth Option in Table 2). These scenarios use the ONS 2020 Mid-Year Estimate and then calibrate either to assume migration rates over the last five years (in the case of the PG-Short Term) or 19 years (PG-Long Term).

The below table has been put together using the ONS' 'Local Area Migration Indicators' dataset from September 2021 and shows the net balance of inflow and outflow over the last ten years to and from Newport from other parts of the UK. In this case, it is calculated by subtracting the number of people that leave NCC to move to another local authority from the number of people that move to NCC from another local authority:

Year, Net Internal Inflow

2010-2011 90,

2011-2012 -197,

2012-2013 -357,

2013-2014 -485,

2014-2015 -11,

2015-2016 271,

2016-2017 1098,

2017-2018 1211,

2018-2019 445,

2019-2020 1118

The table shows a changing balance over the last 10 years, from a period where there was a net outflow of people from Newport to a situation since 2015-2016 where there has been a sustained and significant net inflow of people from Newport. Assuming a household size of 2.3 people, the net inflow would represent an additional 486 homes per annum for 2019/2020. The 2018/2019 figure is an anomaly as a result of COVID19 - something that is recognised in Paragraph 2.15 of the "LDP Demographics" Paper.

The 'LDP Demographics' Paper prepared by Edge Analytics explains why it is the case that there has been a net inflow since 2015/2016 at Paragraph 2.14 which states that:

"Likely factors driving this increase include the rate at which new homes have been built, the removal of the Severn Bridge toll in 2018 and the introduction of ONS' Higher Education Leavers Methodology (HELM)."

The fact that this the greatest net inflow is from Bristol, North Somerset, and South Gloucestershire (Figures 14 and 15 of the LDP Demographics Paper) helps to confirm this conclusion. The position with regards to the Severn Bridge tolls is fixed - the tolls have been removed and there is no indication of them being re-introduced. There is therefore no structural reason as to why the net inflow of people would reverse in coming years.

Noted. The Growth Option taken forward is discussed in detail in the Preferred Strategy Cabinet Paper, the Preferred Strategy Consultation Paper and associated Background Papers. To be passed to Edge for further consideration.

<p>Policy 33 (National Growth Area - Cardiff, Newport, and The Valleys) recognises the importance of a collaborative approach with neighbouring authorities, stating that:</p> <p>'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'</p> <p>Barratt David Wilson Homes do not suggest it would be the right approach for either of the PG scenarios to be chosen as a Growth Option as ultimately they look at previous trends rather than future projections to come over the RLDP plan period, but it is clear that the level of UK based migration is such that a significant uplift on the selected demographic scenario should be applied and that this should be based on a PG option that considers the level of net internal migration over the last four years since the tolls have been removed (excluding the year effected by the COVID19 pandemic) rather than a longer time window. This should be applied as a "multiplier" on top of Growth Option 2.</p>	
<p><u>Point 3 – Wider Political, Economic, Social, and Environmental Context</u></p> <p>The main document that sets out how Newport should be seen in the context of the wider South East Wales region is Future Wales: The National Plan 2040. The status of Future Wales is set out in Section 2.1 of the Growth and Spatial Options document – it is a development plan document and, by virtue of its status, the Replacement LDP must be in conformity with it.</p> <p>There's no need to repeat exactly what is said in either document but the wording of from Policy 33 (National Growth Areas – Cardiff, Newport, and The Valleys) is clear:</p> <p>"The Welsh Government supports an increased strategic role for Newport as a focus for sustainable, long-term growth and investment."</p> <p>This is built upon in the Policy's subtext which, in the first paragraph on Page 165, states that:</p> <p>"The Welsh Government is determined to see development and growth in Newport, allowing the city to fulfil its potential as a second focal point for the region."</p> <p>A reading of the remainder of the policy wording and its supporting subtext effectively states that this should be achieved by Newport:</p> <ul style="list-style-type: none"> • Having an increased strategic role for sustainable long term growth, • Being a growth pole for new housing in the eastern part of South East Wales; and • Working alongside neighbouring authorities (both in South East Wales and England) to achieve this. <p>The implications of this are that any Growth Option selected must be aspirational and this is recognised in Section 3.1 of the Growth and Spatial Options document which, on Page 12, explains that a number of the options suggested in Table 1 have been dismissed due to their low scale of growth not being in conformity with Future Wales.</p> <p>The status of Newport in Future Wales is such that there is further justification for the selection of Growth Option 2 as a starting point given that it is aspirational in nature whilst the encouragement to work with neighbouring local authorities suggests that net inflow into Newport from neighbouring authorities should be welcomed and planned for through the incorporation of a PG scenario.</p>	<p>Noted. The Growth Option taken forward is discussed in detail in the Preferred Strategy Cabinet Paper, the Preferred Strategy Consultation Paper and associated Background Papers.</p>

<p><u>Assessment of Growth Options Against RLDP Objectives</u></p> <p>Appendix A of the Growth and Spatial Options Document provides an appraisal of the performance of the six Growth Options against the 10 RLDP Objectives, in essence allowing to create a matrix that allows for comparison between the various options. This is built upon further in Appendix A of the Document. Barratt David Wilson Homes' concern is that the assessment undertaken as part of Table 3 and in Appendix A assumes that a certain Growth Option will have an "Amber" or even "Red" impact when the selection of appropriate sites which are environmentally and technically acceptable (or incorporate appropriate mitigation, compensation, and enhancement to achieve this) can mean that they can be delivered without a negative impact (i.e. with a "Green" or, at worst, "Amber" impact). In this sense, it is essential to stress that the comprehensive submission that Barratt David Wilson Homes made as part of the Call for Sites demonstrated that CS0045 – Land at Bettws Hill could be delivered in a way which is technically and environmentally sound such that the performance against many of these objectives could instead be considered to be "Green" in this context.</p>	<p>Noted. This assessment was produced for the purpose of the Growth and Spatial Options consultation, however the Integrated Sustainability Appraisal (ISA) assesses these in more detail.</p> <p>Candidate Site assessments are being carried out as part of a separate process. The results of the Stage 1 assessment can be found in the Candidate Site's Register. Stage 2 of the assessment will be published as part of the Preferred Strategy consultation.</p>																
<p><u>Extent of Flexibility Allowance</u></p> <p>Paragraph 5.58 of Edition 3 the Development Plans Manual (March 2020) is clear that there is a requirement for a flexibility allowance to be added on top of the housing requirement to derive the number of homes than RLDP should plan for. This is in the interest of ensuring that sufficient housing is delivered when some allocated sites either are not delivered or deliver less home than anticipated. Paragraph 5.59 of Edition 3 the Development Plans Manual is clear that the extent of the flexibility allowance should be informed by local issues with 10% as a starting point (i.e. as the minimum). Barratt David Wilson Homes recognise that the extent of the flexibility allowance will be determined considerably later in the RLDP preparation stage, likely at Deposit stage and that it is inappropriate to comment too much on this at this time.</p> <p>That said, Indicator OB4 MT3 of the Annual Monitoring Report (October 2022) for the period from April 2021 to April 2022 recognised a cumulative shortfall in housing delivery against the LDP's housing trajectory. Historic performance against this indicator is presented in the table below:</p> <table border="1"> <thead> <tr> <th>Year</th> <th>% Delivery Against Cumulative Required Rates</th> </tr> </thead> <tbody> <tr> <td>2015</td> <td>-5%</td> </tr> <tr> <td>2016</td> <td>3%</td> </tr> <tr> <td>2017</td> <td>-2%</td> </tr> <tr> <td>2018</td> <td>-6%</td> </tr> <tr> <td>2019</td> <td>-9%</td> </tr> <tr> <td>2020</td> <td>-12%</td> </tr> <tr> <td>2021</td> <td>-14%</td> </tr> </tbody> </table> <p>Importantly, this is against the housing requirement of 10,350 homes and not the 11,623 homes that the adopted LDP plans for. In essence, in 2021 where the rate is a -14% rate, this is 14% below the housing</p>	Year	% Delivery Against Cumulative Required Rates	2015	-5%	2016	3%	2017	-2%	2018	-6%	2019	-9%	2020	-12%	2021	-14%	<p>Noted, the Preferred Strategy Cabinet Paper, the Preferred Strategy Consultation Paper and associated background papers provide greater detail on this.</p>
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<p>requirement but 26% below the number of homes that were planned for which incorporated the 12% buffer in the adopted LDP.</p> <p>Even at this stage it is clear from the above that the 12% buffer in the adopted LDP is entirely inadequate and a greater buffer should be incorporated for the RLDP.</p> <p><u>Conclusion</u></p> <p>Taking the above together Barratt David Wilson Homes suggest that Growth Option 2 should be used as the starting point but should be enhanced to reflect the higher levels of net inflow into Newport in recent years and Newport’s significance to the South East Wales region in Future Wales. Whilst for consideration in subsequent consultations, a greater flexibility should be applied on top of the housing requirement than that in the adopted LDP.</p>	
<p>Spatial Options</p> <p>8. Which of these options do you feel is the most appropriate, and why?</p> <p>9. Are there any other spatial distributions that should considered, and if so, why?</p> <p>10. Are there any other matters that should be given consideration when assessing these?</p>	
<p><u>Background and Policy Context</u></p> <p>Chapter 4 of the Growth and Spatial Options Document presents four Spatial Options as to how the requirements outlined in Chapters 2 and 3 should be distributed spatially. Four options are presented - one which would be to focus new housing on previously developed land, a second which would be to focus on a series of greenfield allocations on the edge of the urban boundary, a third of directing growth to nine identified villages, and a fourth which is a hybrid of the previous three options.</p> <p>Paragraph 3.44 of Planning Policy Wales Edition 11 (February 2021) provides guidance as to how the site search sequence should be undertaken when identifying residential allocations, stating that:</p> <p>"Where there is a need for sites, but it has been clearly demonstrated that there is no previously developed land or underutilised sites (within the authority or neighbouring authorities), consideration should then be given to suitable and sustainable greenfield sites within or on the edge of settlements. The identification of sites in the open countryside, including new settlements, must only be considered in exceptional circumstances and subject to the considerations above and paragraph 3.50 below."</p> <p><u>Commentary on Reliance on Previously Developed Land Approach</u></p> <p>Whilst there is no doubt that the delivery of previously developed land (PDL) is prioritised in national planning policy, the Growth and Spatial Options Document recognises that there is not going to be sufficient previously developed land available for the continuation of the PDL-led approach taken in the adopted LDP. The first paragraph of Section 5 of Document is clear on this, stating that:</p> <p>"While the merits of continuing this strategy are understood, there is some concern that previously developed land is a finite resource and the availability of sites may not be as buoyant as it was or the reuse of land for housing may require the de- allocation of some employment sites."</p>	<p>Noted</p>

<p>On this basis, the selection of the PDL-led Spatial Option is not going to be sufficient to meet the higher Growth Options (and importantly the Growth and Spatial Options paper discounts the lower Growth Options).</p> <p>There is also a wider point as to whether reliance on a PDL-led strategy is a sufficiently robust Spatial Strategy to ensure that the housing requirement is delivered in full. The adopted LDP relies on a PDL-led strategy and, as set out in connection to the flexibility allowance for the Growth Options questions, this has resulted in a significant shortfall of housing delivery compared to the housing trajectory. Analysis from the Annual Monitoring Report (October 2022) for the period from April 2021 to April 2022 shows that there are 1,189 (equating to 11.5% of the total housing requirement) units that the adopted LDP anticipated to be delivered on brownfield sites in the adopted LDP plan period but now are not expected to be delivered prior to its end date in 2026.</p> <p>From the above, it is clear that there is not enough PDL land for the implementation of a PDL-led Spatial Strategy and that, even if there was, the implementation of a PDL-led approach would likely result in a shortfall in delivery against requirement. Barratt David Wilson Homes therefore suggest that:</p> <p>Any PDL allocations in the adopted LDP where development has not commenced should continue to be supported through a positive allocation but should not be relied upon to meet the housing requirement;</p> <ul style="list-style-type: none"> o No PDL allocations should be made on sites with capacity for less than 50 homes. These should be allowed to come forward as windfall sites; and o New PDL allocations in excess of 50 homes that are counted towards meeting the housing requirement should only be made where it has been demonstrated that these are available and viable. 	
<p><u>Suggested Approach</u></p> <p>The higher Growth Options (including the modified Option 2 that Barratt David Wilson Homes are suggesting) that are set out in the Growth and Spatial Options Document are unlikely to be able to be met in their entirety through either the "Village Focus" Spatial Option or the "Urban Expansion" option and therefore it is suggested that the "Hybrid" Spatial Option is really the only suitable Spatial Option that can deliver the higher Growth Options that are suggested and continue to perform strongly against the RLDP's objectives. As part of this, it is essential that the "Hybrid" Spatial Option directs new housing to the most appropriate locations which, for the reasons set out below, should include Bettws.</p>	<p>Noted. The Spatial Option taken forward is discussed in detail in the Preferred Strategy Cabinet Paper, the Preferred Strategy Consultation Paper and associated Background Papers.</p>
<p>Policy 34 (Green Belts in the South East) of Future Wales: The National Plan 2040 is deliberately vague in describing what the Green Belt should cover, instead stating only that it should be located to the north of Newport. In all of the Illustrative Diagrams that accompany the four Spatial Options, an "Assumed Area Under Consideration for New Green Belt" is shown wrapping around Bettws but not across other areas which could be considered to be north of Newport. It is understood that a piece of technical work has been commissioned by the Cardiff Capital Region and it is suggested that the current approach to identifying the extent of the Green Belt, and potentially excluding settlements and sites because of it, would be prejudicial. Notwithstanding this, it is considered that any Green Belt should go to the north of</p>	<p>Noted, the Preferred Strategy Cabinet Paper, the Preferred Strategy Consultation Paper and associated background papers provide greater detail on this.</p>

Bettws and not wrap around it to the south. The below table assesses the southern edge of against the five Green Belt purposes as set out in Paragraph 3.67 of Planning Policy Wales Edition 11 (February 2021).

Green Belt Test-Assessment

Green Belt Test	Assessment
Prevent the coalescence of large towns and cities with other settlements –	There is a separation distance of some 1.5km from the southern edge of Bettws to the northern edge of Newport and, notwithstanding this, the M4 would prevent coalescence.
Manage urban form through controlled expansion of urban areas	There are opportunities to deliver new housing on the southern side of Bettws that would be well related to existing development such that it does not appear as an unnatural extension into the countryside. The suitability of such developments can be demonstrated through appropriate landscape and visual technical work.
Assist in safeguarding the countryside from encroachment	
Protect the setting of an urban area	Bettws contains no listed buildings, conservation areas, or Scheduled Ancient Monuments, nor is land on its southern edges subject to any landscape designations that would mean that it's setting is of particular significance.
Assist in urban regeneration by encouraging the recycling of derelict and other urban land	It is considered that the allocation of proportionate amounts of greenfield land adjoining Bettws could happen without prejudicing brownfield land coming forward as windfalls sites.

The southern side of Bettws is an entirely appropriate location for new housing:

- Given the suggestions in the table above, the southern side of Bettws should not be considered to be within the "Assumed Area Under Consideration for New Green Belt";
- It is largely free from fundamental constraints in that it is largely free from flood risk, is not washed over by, and is generally distant from, significant landscape, ecological and heritage designations (unlike land to the north of Bettws),
- As demonstrated in the Transport Assessment (prepared by Vectos) submitted as part of the Call for Sites, Bettws is a sustainable location which is well-connected to local bus routes and contains a mix of local services;
- It would add to the range and choice of housing supply locally in a context where the adopted LDP:
 - Did not make new housing allocations within Bettws, instead only creating a positive planning context for a single existing housing commitments which has now been fully delivered;

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<ul style="list-style-type: none"> ○ By virtue of its previously developed land approach, delivered housing at high densities in urban areas; and ○ Focuses much of the new housing growth towards southern and eastern parts of NCC Rather than in northern and western locations such as Bettws. ● As demonstrated by Barratt David Wilson Homes' experience in the delivery of the Former Bettws Comprehensive site, Bettws is an attractive location such that there can be confidence of successful delivery. 	
<p><u>Conclusion</u> Barratt David Wilson Homes recognise the "Hybrid" Spatial Option to be the only approach that can realistically be relied upon to deliver the housing requirement. That said, the approach needs to focus growth in those locations where it is appropriate and, for the reasons above, it is suggested that Bettws is one of those.</p>	<p>The Deposit Plan will include a review of the urban and village boundaries. The Settlement Assessment Background Paper provides a village appraisal.</p>

GSO 025 - Caerleon Civic Society - 00034

Question / Response	Officer Response
<p>Growth options Growth Scenarios - 309 209 49 Are there any scenarios that have been discounted which should be considered further, and why? Which of the options do you feel is the most appropriate, and why? Assessment of Growth Options Against RLDP Objectives - Are there any other matters that should be taken account of when assessing these scenarios and identifying a Preferred Strategy?</p>	
<p>1. No. Lower growth scenarios would not be in line with Welsh Government direction. Higher growth scenarios would be unsustainable and would place unmanageable pressures on infrastructure. 2. Option 2 is most likely to achieve sustainable growth over the whole plan period and appears, at this stage of analysis, to imply most positive outcomes and least negative outcomes. 3. There is some evidence tracked in the Annual Monitoring Reports (but not the latest one because of lack of data on multiple deprivation) that the previous plan period of high , housing led growth has been paralleled by a growing deprivation in Newport and a widening social and economic gap between the most deprived areas and the least deprived. Is this an unintended consequence of high housing growth and its location, tenure and affordability or the product of wider forces in the economy and society? Is the issue of social segregation and cohesion a matter for a Local Development Plan - if not, how can this issue be addressed and influenced by the City Council?</p>	<p>Noted. The Growth Option taken forward is discussed in detail in the Preferred Strategy Cabinet Paper, the Preferred Strategy Consultation Paper and associated Background Papers.</p>
<p>Employment Land Options Recommendation One - 4. Is this requirement appropriate for Newport?</p>	

<p>5. Should it be different and if so, why? Recommendation Two -</p> <p>6. Should some sites be removed from the employment supply? Why?</p> <p>7. Should alternative land uses be considered for some sites? Please provide examples of such uses and your rationale for this.</p>	
no comments	Noted
Spatial options	
<p>8. Which of these options do you feel is the most appropriate, and why?</p> <p>9. Are there any other spatial distributions that should be considered, and if so, why?</p> <p>10. Are there any other matters that should be given consideration when assessing these?</p>	
<p>8. Probably the hybrid option. The Annual Monitoring Report for 2022 indicates that 93% of new homes have been delivered on PDL land. We do not feel that this level of PDL development can be sustained over the future plan period. Also local experience shows that the abnormal costs of developing some PDL land cannot accommodate the required level of Section 106 investment. Whatever spatial option is preferred, our local experience is that due weight must be given to the capacity of the local infrastructure to meet the needs of an increasing population and there should be an explicit assessment of the likelihood that the infrastructure will improve alongside housing growth - if this likelihood is low then well-being objectives will not be met</p> <p>A scattered growth option - smaller housing developments in many locations - would not meet the Objectives. A single 'new settlement' is worthy of consideration, depending upon its location, in order to meet a full range of Objectives in one place.</p> <p>9. The report states that '....land availability will need further consideration when determining the preferred spatial option.' The lack of information about land availability, including the list of candidate sites, crucially limits the ability of the general public to assess the options identified. It is accepted that such information will inevitably focus attention on local issues rather than strategic considerations. However it is difficult to assess the differences between the identified spatial options without some general information on land availability and the willingness of landowners and developers to bring it forward. In South Torfaen, the availability of full information about candidate sites has enabled a wide and informed debate about the strategic viability of large scale development in this area adjacent to Newport, as well as raising local implementation issues which are probably not relevant at this stage of plan-making.</p>	<p>Noted. The Spatial Option taken forward is discussed in detail in the Preferred Strategy Cabinet Paper, the Preferred Strategy Consultation Paper and associated background papers.</p> <p>Candidate Site assessments are being carried out as part of a separate process. The results of the Stage 1 assessment can be found in the Candidate Site's Register. Stage 2 of the assessment will be published as part of the Preferred Strategy consultation.</p>
Evidence Base	
<p>11. Are there any other pieces of evidence that you believe should inform the development of the preferred growth and spatial options strategies?</p> <p>12. Are there any other comments you'd like to make regarding anything within this consultation document? Do you agree with the Objectives for the RLDP? If not, how and why do you think they should be changed?</p>	
<p>11. Is there any empirical evidence about where the people, who have moved to live in the new homes built in the last 10 years, are employed and how they currently travel to work? It is difficult to</p>	<p>The Demographic Evidence, Employment Land Review (NB not executive summary) detail what key economic factor have been considered.</p>

<p>assess the stated importance of reducing commuting and developing a more self-contained city if we don't know enough about the current base-line and how future housing-led growth will impact on it.</p>	
<p>12. We would support the introduction of a green belt to the north and west of Caerleon, and in other appropriate parts of the city. This provides an essential balance to further housing-led growth. It is vital that the green belt concept is also applied to areas adjacent to the Newport boundary with Caerphilly, Torfaen and Monmouthshire.</p> <p>It is accepted that the spatial options maps are indicative. However, there is strong local feeling that the proposal for a railway station in Caerleon, included in the previous plan, appears to have been dropped. We consider that this issue should remain open for public discussion on the basis of providing a further important travel option for the local community although we do not consider that the Future Wales statement, that development around new and improved metro stations should be high density and mixed use, is appropriate in the case of every new station, including Caerleon.</p>	<p>Noted</p> <p>The Newport Local Development Plan currently includes policy T1, which supports all proposals for new stations, including a station at Caerleon. The role of the Local Development Plan is to facilitate new and improved stations, but it does not directly allocate these or determine the location of new stations.</p> <p>As part of this process the LDP team will continue to work with partners, including Welsh Government and Transport for Wales, during the preparation of the replacement LDP to ensure any amendments to policy T1 reflect the opportunities identified by the appropriate transport strategies and that our development strategy seeks to support the delivery of strategic and local transport improvements.</p>

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026 - RPS Consulting Services Ltd - 00853

Question / Response	Officer Response
<p>GROWTH OPTIONS: Growth Scenarios - 1. Are there any scenarios that have been discounted which should be considered further, and why? 2. Which of the options do you feel is the most appropriate, and why? Assessment of Growth Options Against RLDP Objectives - 3. Are there any other matters that should be taken account of when assessing these scenarios and identifying a Preferred Strategy?</p>	
<p>1. There are no scenarios that have been discounted that should be considered further. 2. The higher housing growth scenarios published in the growth and spatial options paper accurately reflect that the RLDP has to conform with the Future Wales' spatial strategy. The RLDP should recognise the National Growth Area as the focus for strategic economic and housing growth; essential services and facilities; advanced manufacturing; transport and digital infrastructure. Option 1 (Dwelling-led SYR) is the most appropriate of the growth scenarios to fulfil Future Wales. The Welsh Government is determined to see development and growth in Newport, allowing the city to fulfil</p>	<p>Noted. The Growth Option taken forward is discussed in detail in the Preferred Strategy Cabinet Paper, the Preferred Strategy Consultation Paper and associated Background Papers.</p>

<p>its potential as a second focal point for the region. Highly skilled employment opportunities in the transport and digital communications sectors should be catalysts for further economic investment. Option 1 proposes the highest amount of dwellings across the local authority. This is essential to enhance Newport's economic role. The Dwelling-led 5YR scenario has a higher but realistic population change than Option 2 WG-2018-HIGHPOP. This is the step change necessary to achieve the National Plan. Option 1 is the only option with housing supply above the current LDP strategy, therefore, reflecting Newport's focus for growth role established by the Future Wales National Plan 2040.</p> <p>3. Option 1 will overall bring a neutral contribution to the RLDP objectives; population and communities, health and wellbeing, equality, diversion and inclusion and transport and movement. The risk of not achieving a step change for the City and delivery of growth as envisaged in Future Wales should be a matter for consideration when assessing the scenarios. To de-risk the plan the Preferred Strategy should be based upon a robust assessment of the capacity to deliver Option 1. Delivery and viability should be embedded in the next stages of the candidate site process. An adequate flexibility allowance should be applied to de-risk the plan.</p> <p>The preferred strategy should be based on an objective assessment of the role and function of places within Newport in line with the search sequence and National Sustainable Placemaking Outcomes, as set out in Planning Policy Wales. Delivery against the objectives of the Wellbeing of Future Generations Act and the UN Sustainable Development Goals can provide further surety that the strategy will create inclusive, connected, adaptable and accessible communities that are cohesive and ensure Newport's potential is realised.</p>	
<p>EMPLOYMENT LAND OPTIONS:</p> <p>Recommendation One -</p> <p>4. Is this requirement appropriate for Newport?</p> <p>5. Should it be different and if so, why?</p> <p>Recommendation Two -</p> <p>6. Should some sites be removed from the employment supply? Why?</p> <p>7. Should alternative land uses be considered for some sites? Please provide examples of such uses and your rationale for this.</p>	
<p>4. Recommendation 1 is the minimum requirement to fulfil the expectations of Future Wales for Newport to be the focus for strategic economic growth; essential services and facilities; advanced manufacturing; transport and digital infrastructure.</p> <p>5. Yes, it should probably be different. If the supply to match the requirement is to include the sites identified in the ELR, the requirement should be higher.</p> <p>Given the need to fulfil the local and sub regional (CCR) employment sites, other than those that have little to no prospect of being deliverable in the Plan Period, sites should not be removed from the employment land supply.</p>	<p>Noted. The Growth Option taken forward is discussed in detail in the Preferred Strategy Cabinet Paper, the Preferred Strategy Consultation Paper and associated Background Papers.</p>

<p>6. TAN 23: Economic Development and PPW state that an existing employment site should only be released for other uses if other priorities, such as housing need overrides more narrowly focused economic considerations. The economic considerations are of national significance as per the growth strategy (Future Wales).</p> <p>7. No particular comment at this stage.</p>	
<p>SPATIAL OPTIONS:</p> <p>8. Which of these options do you feel is the most appropriate, and why?</p> <p>9. Are there any other spatial distributions that should be considered, and if so, why?</p> <p>10. Are there any other matters that should be given consideration when assessing these?</p>	
<p>8. With regard to spatial options, a hybrid approach is favoured with a mixture of previously developed land, sites on the edge of the urban boundary and sites at surrounding existing villages. Where there is a need for sites and there is no previously developed land or underutilised sites, consideration should be given to suitable and sustainable greenfield sites within or on the edge of settlements. A balance of previously developed land, sites on the edge of the urban boundary and sites at surrounding existing villages will ensure a range of locations and size of sites. A range of sites derisks the delivery of the RLDP. The hybrid approach scores highly against the RLDP objectives for Economy and Employment, health and wellbeing and biodiversity and geodiversity.</p> <p>PPW is clear due to their strategic nature Green Belts will have significance beyond a single local authority and they should only be proposed as part of either a Joint LDP, an SDP or Future Wales. The Green belt needs to be balanced with placemaking potential and achieving the growth strategy as per Future Wales. The national plan envisages strategic growth should be focused in and immediately adjoining Newport itself.</p> <p>9. The four spatial distributions provided cover the full range of options from urban to rural land use for development, with the addition of a mixture of both. Under the urban expansion scenario, it is clear that unconstrained and deliverable sites in the identified locations in the East of Newport (such as at Langstone) can play a clear role in supporting the hybrid scenario.</p> <p>10. The hybrid option scores favourably as per the assessment of spatial options. To de-risk the delivery of the plan as per the LDP Manual 3 a further matter for consideration is the delivery risk associated with each of the spatial options. The hybrid option is low risk and can help to deliver a balanced supply along with a balanced distribution, with sites on the East (such as at Langstone) having excellent linkages to the city centre and beyond and employment.</p>	<p>Noted. The Spatial Option taken forward is discussed in detail in the Preferred Strategy Cabinet Paper, the Preferred Strategy Consultation Paper and associated background papers.</p>
<p>EVIDENCE BASE:</p> <p>11. Are there any other pieces of evidence that you believe should inform the development of the preferred growth and spatial options strategies?</p> <p>12. Are there any other comments you'd like to make regarding anything within this consultation document? Do you agree with the Objectives for the RLDP? If not, how and why do you think they should be changed?</p>	

<p>11. The current evidence base used to inform the development of the preferred growth and spatial options strategies is sufficient and critically encapsulates Newport as a growth area in National planning policy.</p> <p>12. It is important that the RLDP takes a pragmatic approach and provides a good balance between housing and employment growth opportunity. There needs to be a strong focus on those identified areas for growth in the paper. A good range of different house types and tenures in a range of locations should be supported through the RLDP, taking advantage of available land on the edge of Newport (such as at Langstone) to help deliver an appropriate scale of growth for the City.</p>	Noted
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GSO 027 - St. Modwen Developments Limited – 00648

Question / Response	Officer Response
<p>COMMENTS ON BEHALF OF ST. MODWEN LOGISTICS</p> <p>Savills is instructed by St. Modwen Logistics (“SML”) to make representations to the Newport Replacement Local Development Plan (“RLDP”) Growth and Spatial Options consultation. Comments are made in respect of both the Growth and Spatial Options paper (January 2023) and the Employment Land Review (February 2022) which accompanies it. Enclosed is a Comments Form, however, given the constraints of the form the substance of the comments is presented in this letter.</p> <p>As you will be aware, SML is promoting St. Modwen Park Newport, the employment area on the eastern side of the residential led mixed used regeneration of Glan Llyn which sits on the former Llanwern Steelworks site. This is one of the Newport’s (and South Wales’) key regeneration schemes and lies on a major gateway into South Wales. The site is previously developed (or brownfield) land and occupies a strategic and sustainable position. It is some 243 hectares in size (of which approximately 37 hectares is St. Modwen Park Newport) and basically free from environmental designations and constraints. It has, however, been severely affected by its’ heavy industrial past.</p> <p>To date, SML and an experienced project team have fostered strong working relationships with key stakeholders and officers at Newport City Council (“NCC” or “the Council”). All parties recognise St. Modwen Park Newport (and Glan Llyn, the residential led component) as a clear local and regional priority for regeneration. The significant progress made to date demonstrates that a mixture of uses is possible, and it is important that the site continues to feature as part of an allocated site in the RLDP. To ensure that it does, the entire site (Glan Llyn and St. Modwen Park Newport) was promoted as a Candidate Site in August 2021. The submission reinforced the sites’ potential for further redevelopment and recommended that St. Modwen Park Newport’s allocation within the Eastern Expansion Area (“EEA”) is maintained in the RLDP as a specific regeneration allocation.</p> <p>This letter has been prepared to provide some further explanation of St. Modwen Park Newport’s credentials and commentary on the Growth and Spatial Options presented as well as the Employment</p>	Noted

<p>Land Review which forms part of the emerging evidence base for the RLDP. It starts with the headlines of the current position and background, considers the current policy position before commenting on the Growth and Spatial options, Employment Land Review and general comments.</p>	
<p><u>St. Modwen Park Newport – current position and background</u></p> <p>St. Modwen Park Newport is part of a very significant mixed use regeneration project. The site (and the EEA that it forms part of) is one of the cornerstones of Newport’s sustainable growth strategy. Outline planning permission was granted in April 2010 for the whole scheme (ref. 06/0471). The basic proposition is a new neighbourhood of approximately 4,000 new homes in a high quality (and transformed) environment, a local centre and a business park (now known as St. Modwen Park, formerly Celtic Business Park).</p> <p>The wider site is rectangular in shape with longer sides of approximately 2km and shorter sides of 1km. Its western boundary is formed by Newport Retail Park District Centre (Spytty), its northern boundary by the Tata and main railway lines and its eastern boundary by the retained Tata Llanwern Steelworks. Its long southern boundary is formed by the Queensway (A4810). St. Modwen Park Newport is approximately 37 hectares that sits on the eastern side of the wider site and is therefore strategically located to provide excellent connectivity to South Wales and South West England, with Junction 23A of the M4 motorway within two miles of the park via Queensway, and Cardiff and Bristol reachable within 12 miles and 30 miles respectively. The estate and surrounding area benefit from the de-tolling of the Severn Bridges, further enhancing its accessibility by road.</p> <p>St. Modwen Park Newport has its own sub area masterplan which was approved in 2015, known as the Employment Area Masterplan. The main road access has been approved and installed and the first four phases for business units have Reserved Matters approval, with some built and occupied and others expected to be constructed shortly. Phase 1 saw Unit 1 constructed and occupied by Amazon. Phase 2 saw two units (Units 2 and 3) built and occupied by Mitel and Genpower respectively. Phase 3 saw the development of CAF’s train manufacturing plant developed in the northern part of the site. More recently, Phase 4 secured Reserved Matters approval in July 2021 and has recently been built out, delivering a further four business units (Units 4-7). Phase 5 (Units 8-10) secured Reserved Matters approval in March 2022, delivering three additional units (Units 8-10).</p> <p>SML is committed to the ongoing redevelopment of St. Modwen Park Newport with further Reserved Matters applications expected to follow during 2023-25 for the balance of the site. The successful delivery at Glan Llyn and St. Modwen Park Newport to date has been achieved in very difficult market conditions – especially at the beginning of the development process for a very large scheme. Very few other sites have made anything like the progress that Glan Llyn has in these conditions. The site is allocated in the current Local Development Plan (January 2015) (“LDP”). Given the success of recent phases and number of remaining phases to be developed it is therefore entirely reasonable for NCC to continue to allocate St. Modwen Park Newport for redevelopment in the RLDP (2021-2036) and to</p>	<p>Noted</p>

<p>expect rates of development to increase as economic conditions improve and further key milestones are made with the next phases of business units at St. Modwen Park Newport.</p>	
<p><u>Existing planning policy</u> <u>Future Wales – The National Plan 2040 (February 2021)</u> Policy 33 (National Growth Area – Cardiff, Newport and the Valleys) recognises Newport as part of a wider National Growth Area across the south east. The policy notes: “Cardiff, Newport and the Valleys will be the main focus for growth and investment in the South East region. Strategic and Local Development Plans should recognise the National Growth Area as the focus for strategic economic and housing growth; essential services and facilities; advanced manufacturing; transport and digital infrastructure.” The policy continues: “The Welsh Government supports an increased strategic role for Newport as a focus for sustainable, long-term growth and investment. The Welsh Government will work with authorities within the region and in England to promote Newport’s strategic role and ensure key investment decisions in Wales and England support Newport.” It is therefore clear that, at a national level, the strategic and sustainable development of regeneration schemes, of which St. Modwen Park Newport is a part, should have full support.</p> <p><u>Planning Policy Wales (Edition 11, February 2021)</u> Planning Policy Wales (“PPW”) is specific in recognising a sequence of site allocations that “prioritises the use of previously developed land and existing buildings.” Paragraph 3.43 notes: “In developing their spatial strategy planning authorities must prioritise the use of suitable and sustainable previously developed land and/or underutilised sites for all types of development. When identifying sites in their development plans planning authorities should consider previously developed land and/or underutilised sites located within existing settlements in the first instance with sites on the edge of settlements considered at the next stage.” Paragraph 3.55 adds: “Previously developed (also referred to as brownfield) land (see definition overleaf) should, wherever possible, be used in preference to greenfield sites where it is suitable for development.”</p> <p><u>Local Development Plan (January 2015)</u> Following the closure of the former Llanwern Steelworks site, NCC allocated the former ‘heavy end’ of the steelworks and other land in the vicinity in its Unitary Development Plan (“UDP”) as the Eastern Expansion Area (“EEA”). This allocation continues in the current LDP under Strategic Policy SP11. Policy EM1 provides an employment allocation for St. Modwen Park Newport (then known as Celtic Business Park). The strategy of the current LDP recognises that the EEA is integral to the city’s growth strategy and is underpinned by the allocation and delivery of the Glan Llyn regeneration site.</p>	<p>Noted</p>

<p>Strategic Policy SP11 relates solely to The Eastern Sub Area and states that: ‘The Eastern Expansion Area consists of the former Llanwern Steelworks regeneration site known as Glan Llyn H1(47) and EM1(vii), and housing sites at Llanwern Village H1(3), Hartridge High School H1(19) and Jigsaw Site H1(55). This Eastern Expansion Area is identified as a residential led <u>mixed use</u>, sustainable urban expansion area which will provide a range and choice of housing, <u>employment land and community uses</u>.’[Emphasis added]</p> <p>As well as supporting wider growth and regeneration ambitions, St. Modwen Park Newport helps NCC deliver its employment land requirements in a sustainable way. St. Modwen Park Newport will likely contribute to employment land requirements within and beyond the current LDP plan period of 2011-2026.</p>	
<p><u>Comments on Growth and Spatial Options (January 2023)</u></p> <p>As a high-level document, the RLDP’s Growth and Spatial Options sets out six growth options and four spatial options. The options are informed by the current situation and key issues for the RLDP to address via its Preferred Strategy which is expected to itself be consulted upon in Autumn 2023. SML’s general observations are set out below.</p> <p><u>Growth Options</u></p> <p>Appendix A of the document identifies 11 Growth Options which, on page 5 of the document, are narrowed down to “six realistic alternative options, which more align with Newport’s national role as an area for growth.” SML has no comments to make at this stage other than, under all options, it is clear St. Modwen Park Newport is capable of making a significant contribution to the delivery of employment floorspace (which translates into jobs) over the RLDP plan period which should be fully considered under all Growth Options. SML reserves its position to make further comment in the future.</p> <p><u>Spatial Options</u></p> <p>Appendix B of the document identifies four Spatial Options. These are PDL-led, Urban Expansion, Village Focus and Hybrid Approach. SML has limited comments to make at this stage other than, under all options, provision and allowance must be made for the continued delivery of phases of St. Modwen Park Newport. SML reserves its position to make further comment in the future.</p>	Noted
<p><u>Employment Land Review (February 2022)</u></p> <p>There is significant value derived from the industrial and logistics sector nationally and locally to Newport. The ‘Levelling up – The Logic of Logistics’1report prepared by the British Property Federation and Savills in 2022 demonstrates the wider economic, social and environmental benefits of the industrial and logistics sector. The Covid-19 pandemic reiterated how industrial and logistics facilities are a key part of the nation’s critical national infrastructure. The report notes that industrial and logistics sector generates significant economic benefits, employing millions of people nationally and representing approximately £232 billion Gross Value Added.</p> <p>[1 https://bpf.org.uk/media/4772/levelling-up-the-logic-of-logistics-bpf-report.pdf]</p>	Noted

<p>To this end, SML welcome the recognition and value St. Modwen Park Newport’s role in the Newport and South Wales economy is playing as evidenced in the Employment Land Review. For example, paragraph 4.16 (page 49) credits SML with stimulating the market with its commitment to advance speculatively build while paragraph 8.1 (page 103) recognises schemes are being “activity [sic] developed, including some speculative development, primarily for mid to larger units targeting the logistics sector.”</p> <p>SML support St. Modwen Park Newport’s grading of 14/15 in Table 11 (page 81), however note it is not clear how these gradings were derived and how individual sites scored against the Welsh Government criteria. The methodology and calculations should be provided as an appendix. Similarly, SML support St. Modwen Park Newport’s grading of 27/30 in Table 13 (page 85), however note it is not clear how these gradings were derived. The methodology and calculations should be provided as an appendix. SML reserves its position to make further comment in the future in respect of employment land matters.</p> <p><u>General comments</u></p> <p>SML strongly encourage NCC to ensure that emerging planning policy (and how it may be positively, pragmatically and timely applied during development management stages) continues to support the economic development and job opportunities for Newport, such as the delivery and build out of St. Modwen Park Newport.</p> <p>As noted in ‘Levelling up – The Logic of Logistics’ report, the UK planning system is restricting growth. Planning policies must therefore be used to encourage inward investment and developments that look to support direct and indirect economic development within Newport. Employment allocation and protection policies must also look to support facilities/uses complementary to employment areas should they be required – for example, roadside facilities, electric vehicle charging infrastructure, food/drink units and other uses where appropriate within employment areas. In this sense, the wording of Policy EM1 of the current LDP (which notes “the allocations will be protected for employment uses, and alternative uses for the sites will be resisted”) is considered too restrictive and fails to recognise the value complementary alternative uses may provide. It is therefore suggested as the RLDP progresses to draft policies, a criteria-based policy is provided that seeks to enable such complementary uses where appropriately justified. SML would welcome the opportunity to review and consider draft wording of such in due course.</p> <p>With specific regard to industrial and logistic sectors, the Welsh Government and NCC must do all they can to support logistics sector and improve travel movements along the M4, especially following the scrapping of the M4 Relief Road in 2021 and more recent announcements and consequences of the ‘Roads Review’ findings in February 2023. To this end, SML would welcome further engagement with Welsh Government and NCC in identifying ways to encourage logistics development across South Wales.</p>	
<p><u>Conclusion</u></p>	<p>Noted. The Growth and Spatial Options taken forward is discussed in detail in the Preferred Strategy Cabinet Paper,</p>

<p>As stated at the beginning of this letter, SML seeks to reiterate and endorse St. Modwen Park Newport's importance as a key employment site delivering significant employment and regeneration benefits which must be reflected in the RLDP under all growth and spatial options presented. This reflects the planning position and delivery on site to date and the clear potential of the scheme to continue to provide employment floorspace to meet growing demand from businesses who are looking to expand their operations but have been restricted by a chronic undersupply of space across the region.</p> <p>The scheme is a major sustainable regeneration initiative and is a true commitment – outline planning permission has been granted, the site is in the hands of SML (an active and experienced industrial and logistics development company), significant and substantial infrastructure has been installed, several phases have been developed and future phase of development are in the pipeline. St. Modwen Park Newport continues to warrant clear planning support and should be identified as a priority and objective for the RLDP via a specific allocation (in much the same way Policy SP11 (Eastern Expansion Area) performs in the current LDP).</p>	<p>the Preferred Strategy Consultation Paper and associated Background Papers.</p>
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GSO 028 - Mineral Products Association - 00060

Question / Response	Officer Response
<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 reference to the above consultation and further to our previous representations, we have no specific preference on the growth and spatial options outlined, however we would welcome further detail on how the aspirations of the plan will be delivered. This should be assessed as part of the evidence base to deliver policy aspirations.</p> <p>From a mineral's perspective, it is imperative that mineral reserves and planning consents are delivered through the plan policies. Delivering a steady and adequate supply of raw materials will be essential to ensure growth and deliver high quality homes whilst maintaining local vernacular. The supply of minerals</p>	<p>Noted As part of this process the LDP team will continue to work with partners, during the preparation of the replacement LDP to ensure any amendments to policy reflect the opportunities identified.</p>

can not be assumed by the Council. Maintaining a steady and adequate supply of minerals will be reliant on delivering appropriate production capacity and it is important that to deliver the development aspirations of the plan, sustainable supply patterns are considered.

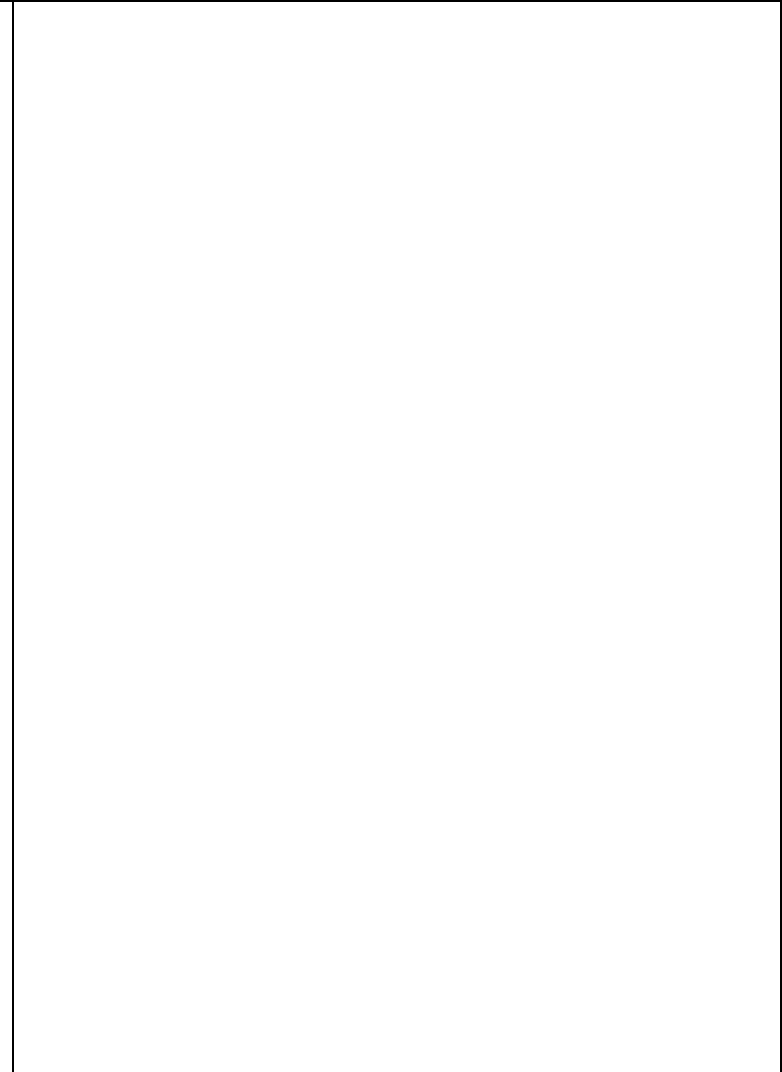
The Regional Technical Statement (RTS) and MTANs are important foundation documents for inclusion in the RLDP review. The RTS 2nd Review published in September 2020 and endorsed by the Council identifies the minimum allocation needed to meet the required provision of crushed rock tonnage for Newport over the plan period. The minimum allocation should be delivered in the plan through appropriate site allocations and criteria-based policies.

The RTS requires the production of a Statement of Sub-Regional Collaboration (SSRC) to be agreed with all other constituent LPAS within the local sub-region, prior to Examination as part of the evidence base. This is essential to ensure Newport can meet its consumption of minerals and mineral products. Development of the SSRC should demonstrate that the SSRC has been produced in consultation with relevant stakeholders, including the South Wales Regional Aggregate Working Party (SWRAWP).

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

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

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



GSO 029 - Persimmon Homes And Welsh Government - 00641

Question / Response	Officer Response
<p>GROWTH OPTIONS: Growth Scenarios -</p>	

1. Are there any scenarios that have been discounted which should be considered further, and why?

2. Which of the options do you feel is the most appropriate, and why?

Assessment of Growth Options Against RLDP Objectives -

3. Are there any other matters that should be taken account of when assessing these scenarios and identifying a Preferred Strategy?

The starting point for any consideration of growth options must be an appreciation of the role of Newport as part of the National Growth Area, as defined by Future Wales. Policy 33 states that this area “will be the main focus for growth and investment in the South East region” and that “The Welsh Government supports an increased strategic role for Newport as a focus for sustainable, long-term growth and investment.” These policy objectives set the scene for the identification of an appropriate level of housing growth in Newport over the RLDP period.

Table 2 of the Growth and Spatial Options document identifies five housing growth options. These range from 507dpa to 838dpa. These options were selected from a longer list of 12 options that were identified and assessed by Edge Analytics (as illustrated in Table 1 of the Growth and Spatial Options document). We note that the four lowest scenarios identified by Edge (with an annual housing requirement of between 319 and 439dpa) were discounted on the basis that they “are much lower than the adopted growth strategy” and “do not reflect Newport’s focus for growth role established by the Future Wales National Plan 2040.” We agree that these low growth scenarios were appropriately discounted but consider that the same conclusions can also be drawn in respect to the proposed Options 2 to 6 inclusive (i.e. housing growth of 507-632dpa):

1. Two of these growth options (Options 5 and 6) would fail to accommodate the level of population growth that has been anticipated by the Welsh Government 2018-based population projections over the LDP period to 2036. This would raise very significant concerns in relation to the vitality of the local community, the strength/scale of the local workforce, and the well-being of future generations. In considering the Welsh Government projections it is noted that they are based on dampened assumptions in relation to fertility and mortality. These assumptions suppress future birth trajectories and increase the rate at which deaths occur due to a reduction in life expectancies. The implication of this is to potentially under-state the level of population growth that is likely to occur in the future.

2. Options 2-6 would all represent a reduction from the current LDP requirement for 690dpa. Over the 15-year LDP period, these would result in the delivery of between 780 and 2,745 fewer homes than would otherwise be associated with a continuation of the existing LDP housing requirement. It is not considered that this would be in keeping with the ambition for a growth strategy for Newport.

3. These options also represent a reduction from past trends; since the start of the LDP period in 2011, an average of 624dpa have been completed (higher than Options 4-6 inclusive and closely aligned with Options 2 and 3) whilst an average of 725 new homes have been delivered each year since the LDP was adopted in 2015 (higher than Options 2-6 inclusive). The Development Plans Manual acknowledges the role of past trends in setting future housing requirements, but it is difficult to see how this would align

Noted. The Growth Option taken forward is discussed in detail in the Preferred Strategy Cabinet Paper, the Preferred Strategy Consultation Paper and associated Background Papers.

<p>with a “policy-on” growth strategy as required by Future Wales. Whilst it is acknowledged that past levels have been above longer term trends, a reduction from this level of housing delivery is not reflective of a growth strategy.</p> <p>4. The Welsh Government has been very critical of the level of housing growth that was proposed in the Monmouthshire LDP. It stated that: “The WG principal housing projection for the plan area, 2,610 units, provides a starting point for the level of housing required. In recognition of build rates achieved over the last 10 years, a higher level of housing may be justified. The proposed level of housing growth should however be no greater than 4,275 units (15 x the 10 year build rate) plus an appropriate flexibility allowance. This will ensure that Monmouthshire continues grow in a sustainable manner based on a locally appropriate level of development which is compatible with policies 1 and 33 of Future Wales.”</p> <p>In considering the applicability of this approach to Newport, it is important to recognise that the Welsh Government’s concerns to the Monmouthshire Preferred Strategy was rooted in the fact that it does not form part of the National Growth Area. The purpose of the National Growth Areas is to act as a focus for growth in employment and housing. A trend-based approach would therefore directly conflict with these aspirations for enhanced growth. Nevertheless, application of a similar approach to Newport would result to a requirement for 646dpa plus a flexibility margin. That figure (even without the margin) is higher than Options 2-6 inclusive.</p>	
<p>Ⓞ A review of ONS Jobs Density data shows that employment in Newport increased from 79,000 to 84,000 between 2011 and 2021 (an average of 500 per annum) and from 77,000 to 84,000 between 2015 and 2021 (an average of 1,167 per annum). Against this context, Options 5 and 6 identify an average of 448 and 389 additional jobs per annum (respectively) – lower than past trends since the start of the current LDP period whilst Options 2-4 identify an average of between 576 and 713 jobs per annum – lower than employment growth since the LDP was adopted in 2015. Even Option 1 indicates a lower level of future employment growth (863 jobs per annum). This highlights a risk that Newport Council might be planning for a reduced rate of future employment growth compared to historic rates. This again sits at odds with the role of Newport within the National Growth Area and the aspirations for economic growth within the CCR.</p> <p>Against this context, it is a matter of concern that the growth scenarios that have been identified point towards a reduction in the rate of housing delivery and that only one high growth option has been considered. It is noted that Edge Analytics did test a PG-Short Term scenario which gave rise to a need for 807dpa but that was disregarded on the grounds that “the two scenarios at the high end of the scale are similar, resulting in overall scales of growth that are only marginally different.” It is accepted that there was only a 3.7% difference in the housing need associated with these scenarios but such a conclusion is difficult to justify in the context of the similarity between Options 2 and 3 (0.9%), Options 5 and 4 (1.85%)</p>	<p>Noted. The Growth Option taken forward is discussed in detail in the Preferred Strategy Cabinet Paper, the Preferred Strategy Consultation Paper and associated Background Papers.</p> <p>The Demographic Evidence, Employment Land Review (NB not executive summary) detail what key economic factor have been considered.</p>

and Options 4 and 6 (4.3%). In the context of a growth area and with Newport's central role, it is a matter of concern that insufficient consideration has been given to the higher levels of growth.

Of the scenarios that have been shortlisted in the Growth and Spatial Options document, we therefore consider Option 1 to be the only one that is appropriate and that would reflect the status of Newport as part of the National Growth Area. As set out above, however, we consider that the PG-Short Term scenario (807dpa) should also have been given further consideration. These are the only two options that would provide the basis for growth when compared to the business-as-usual approach associated with the existing LDP and past trends.

In preparing the LDP, it is important to note that the evidence prepared by Edge Analytics and the Growth and Spatial Options document refer to the level of need for housing over the LDP period. In translating this figure to a LDP requirement, it is appropriate to apply a flexibility margin, as required by paragraph 5.59 of the Local Development Plans Manual:

"It will be extremely rare that all sites identified in a plan will come forward in the timescale anticipated. Whilst there is a need to improve certainty through frontloading, as described earlier in the Manual, there may be instances where site specific circumstances, unknown at the plan making stage, delay the delivery of sites. A development plan will not be effective if it cannot accommodate changing circumstances. This means that a flexibility allowance must be embedded into the plan. The plan will need to evidence there is sufficient flexibility above the requirement to account for non-delivery and unforeseen issues ... The level of flexibility will be for each LPA to determine based on local issues; the starting point for such considerations could be 10% flexibility with any variation robustly evidenced. The policy framework in the plan should be clear regarding the housing requirement, provision, and flexibility allowance. The level of flexibility chosen by the LPA when the plan goes on deposit is broadly maintained upon adoption of the plan." (emphasis as per Development Plans Manual).

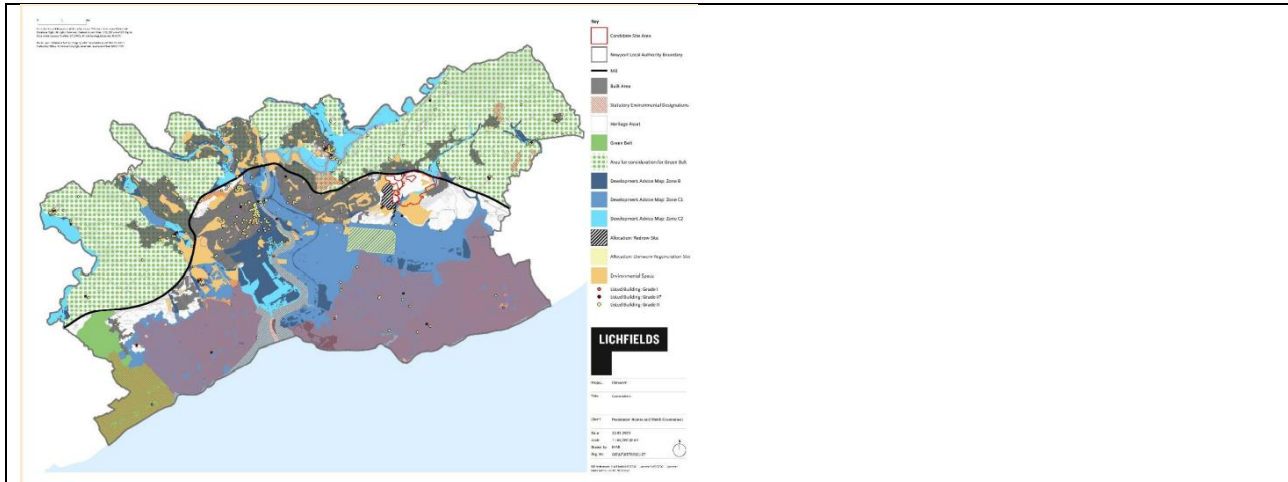
The current Newport LDP has a flexibility margin of 12.3%. This is closely aligned with the figures of adjoining authorities, as summarised below:

1. Cardiff: 9.6%
2. Caerphilly: 19.0%
3. Torfaen: 22.1%
4. Monmouthshire: 10.0%

Going forwards, we would advocate a flexibility margin of 10% as the absolute minimum that should be applied. In the light of this, and in order to ensure consistency with the role of Newport as part of the National Growth Area, we would advocate the requirement for between 807-838dpa. Application of the 10% flexibility margin to these figures would result in a requirement for 890-900dpa –equivalent to 13,350-13,500 over the LDP period. This level of growth would reflect the status of Newport as part of the National Growth Area. In particular, this level of growth would support economic and employment growth, ensure an appropriate level of expansion in the local labour force, facilitate the regeneration of

<p>deprived communities, and support the enhancement of community and social facilities. As set out in this submission, there is clear evidence that this level of growth could be accommodated without any adverse environmental impacts.</p>	
<p>Table 3 of the Growth and Spatial Options document provides a summary of the assessment of the six growth options (as identified on Table 2). These appear to be weighted against population and economic metrics, in favour or environmental considerations. There are a number of inconsistencies in the scores that have been applied and the impact of each option will be largely dependent on the spatial distribution of growth. Of particular concern:</p> <ol style="list-style-type: none"> Options 1-4 all score equally in respect of the economy and employment, even though the number of jobs supported by scenario 1 is 50% higher than that associated with scenario 3. This difference would be significant in terms of realising Newport's potential as part of the National Growth Area and contributing towards the ambitions for the CCR. Options 1-3 have all been awarded the same score in relation to population and communities even though scenario 3 would result in a level of population growth that is lower than that experienced between 2011 and 2021 (1,247 per annum cf. an average increase of 1,386 per annum between the 2011 and 2021 censuses). Such an outcome cannot reasonably be concluded as reflective of Newport's regional and national role. Higher levels of population growth can help to counteract the impacts of an aging population as growth will primarily arise from in-migration amongst younger age groups. Imbalances in the demographic structure as the population ages could otherwise lead to a shrinking labour force having to fund and deliver an increasingly stretched social care programme. It is unclear why all six scenarios have been awarded the same score in relation to health and wellbeing, with the same comments being made for all – that the new housing and employment “could enhance the labour force, introduce new skills or economic opportunities”. This is despite some of the lower growth scenarios resulting in a much lower level of population growth compared to past trends and the Welsh Government projections and a reduction in the size of the labour force. In relation to transport and movement, scenario 3 (638dpa) is awarded a green score (positive contribution) but scenarios 2 (632dpa), 4 (530dpa) and 5 (540dpa) have all been awarded an amber score (positive and negative outcomes). This is in spite of the comment for scenario 4 stating that it would result in “much less development pressure for housing than in Options 1, 2 and 3.” It is not clear how this conclusion was reached. Similarly, scenario 3 is the only option to have been awarded a red score for historic environment, with scenario 4 the only option to have been awarded a green score in relation to this metric. Critically, we note that no specific regard appears to have been given to access to housing and the delivery of affordable housing in particular. Whilst these issues are contained within the population and 	<p>This assessment was produced for the purpose of the Growth and Spatial Options consultation, however the Integrated Sustainability Appraisal (ISA) assesses these in more detail.</p>

<p>communities category, they are addressed alongside a number of other matters (the provision of “the necessary social, environmental, cultural and physical infrastructure to provide safe and healthy places for people that maintain and enhance community and settlement identities”). Given the importance of housing supply, we consider that it should be identified as a specific objective and considered separately to the broader theme of population and communities.</p>	
<p>No information is provided as to how the conclusions of this simplistic “traffic light” analysis will inform the next stages of the LDP process, other than to state that all of the options will be subject to the Sustainability Appraisal and further analysis. In advance of these next stages, it will be important that the Council provides further clarity to the way in which the various metrics are scored and that it ensures that a consistent approach to site assessment is provided. In particular, more equal weighting should be provided to the economic and social factors in order to reflect the status of Newport as part of the National Growth Area</p>	<p>Noted. The Growth Option taken forward is discussed in detail in the Preferred Strategy Cabinet Paper, the Preferred Strategy Consultation Paper and associated background papers.</p>
<p>SPATIAL OPTIONS: 8. Which of these options do you feel is the most appropriate, and why? 9. Are there any other spatial distributions that should be considered, and if so, why? 10. Are there any other matters that should be given consideration when assessing these?</p>	
<p>These representations have been prepared as part of our on-going promotion of the land north of Llanwern for allocation in the RLDP as a residential-led strategic mixed-use development. We consider this to represent one of the best opportunities for development in Newport over the RLDP period. It has the capacity to make a significant contribution to Newport’s future housing need through the delivery of 2,500 new homes in a sustainable location that is well related to the city and accessible by a range of active and public transport modes. Whilst we appreciated that the diagrams in Appendix B of the Growth and Spatial Options consultation document are illustrative only, we welcome the fact that all other than the PDL-led scenario identify land south of the M4, east of the A48 and between the settlements of Llanwern/Milton and Underwood as a broad location for new housing growth. This location clearly aligns with that of the proposed development north of Llanwern.</p> <p>The identification of this area as a location for housing growth reflects the reality of the constrained nature of Newport. Very large parts of the city are within the floodplain and there are significant areas of statutory land designation including National Nature Reserves and Sites of Special Scientific Interest. In addition, the land north of the M4 motorway has been identified in Future Wales 2040 as an area for consideration for a new Green Belt. These constraints, which are illustrated below and explored in more detail in this section, severely limit the opportunities for development in Newport and for it to provide the strategic focus for growth, as anticipated by Future Wales 2040. Against the context of these significant constraints, there is a major opportunity for growth to the east of the city on land between Llanwern village and the M4 motorway. We welcome the fact that this has been recognised in the Spatial Options.</p> <p>-</p>	<p>Noted. The Spatial Option taken forward is discussed in detail in the Preferred Strategy Cabinet Paper, the Preferred Strategy Consultation Paper and associated background papers.</p>



A review of Newport’s existing LDP and 2022 Annual Monitoring Report (AMR) indicates that of existing allocations comprising 100+ units, there are approximately 5,550 units that are yet to be delivered and may therefore be carried over to the emerging LDP, although it will be necessary for the Council to undertake a review of existing allocations to ensure that they are likely to come forward during the RLDP period.

Given our conclusion that the housing requirement contained within the RLDP should be a minimum of 6,350 dwellings, and assuming that the 5,550 undelivered units on existing LDP allocations will be rolled forward into the RLDP, the residual requirement would be a minimum of 7,800 units. It is important to consider how this level of growth might be achieved, having regard to the constraints identified above and the recognised fact that the quantum of brownfield land within the Newport Council area is finite.

Challenges with PDL-led approach

As recognised in the Growth and Spatial Options Document, Newport City Council has been highly successful in the adoption of its PDL-led approach in the currently adopted Local Plan, with 93% of homes being delivered on brownfield land since the Plan’s adoption in 2015. This equates to 6,215 dwellings having come forward on previously developed land over this period. Whilst the principles of this approach are recognised and supported, we agree with the concerns set out in the document regarding the adequacy of brownfield land in Newport to meet the identified future housing requirement. There is a significant quantum of brownfield land remaining at Glan Llyn but that remains an existing commitment and so will not contribute to the residual housing requirement. As Newport Council does not currently have a brownfield register it is not possible to estimate the quantum of previously developed land in the city but this is highly unlikely to be sufficient to provide a deliverable and viable source of capacity to meet the identified housing requirement. This has been acknowledged by Newport Council in its review of the PDL-led strategy in Appendix B of the Growth and Spatial Options document.

Given the extent to which the existing urban area of Newport is subject to flood risk designations, it is likely that a high proportion of brownfield land will also be at risk of flooding and therefore not suitable for residential development. Even where the redevelopment of sites may be acceptable in principle in terms of appropriateness in relation to flood zones, developers may face further financial barriers in ensuring that proposals are resilient to flooding by investing in flood mitigation/management measures. Such costs would be in addition to those associated with clearing the site from existing development and addressing any potential contamination issues. The increased costs associated with flood mitigation and management measures for new developments may have an increasingly detrimental impact on the viability and deliverability of a significant proportion of PDL. Given that the cost of brownfield development is typically higher than greenfield development, the implication of this is that an overreliance on PDL could militate against meeting the identified level of housing in the LDP.

Whilst the intention to drive employment and housing growth to Newport City Centre in order to further stimulate and regenerate the city centre is recognised and supported, there needs to be a range and choice of sites available to meet identified housing needs. Newport's role as part of the National Growth Area provides an opportunity for growth in the Plan area and the focus should be on the identification of sites that are deliverable and free from constraints.

The principle of brownfield-development is recognised and supported it is important that the RLDP strategy is capable of achieving its aims, including in relation to the delivery of new housing. However, we should be concerned that any over-reliance on PDL would threaten the Council's ability to accommodate the level of growth that is needed and thereby undermine its contribution to the National Growth Area. The RLDP should support the redevelopment of brownfield sites but should not be rooted in a strategy that is wholly or largely reliant on this source of land.

Forthcoming TAN15

The forthcoming update to TAN15 (Technical Advice Note on Development, Flooding and Coastal Erosion) (that is currently being consulted on) places a significant proportion of the city centre in Flood Zones 2 or 3 at risk from tidal and fluvial flooding (as shown on the proposed Flood Map for Planning). Whilst the amended proposed TAN15 is more flexible than the existing in that it makes allowances for PDL to be redeveloped for housing in Flood Zones 2 and 3, it specifies that this may strictly only apply to development categorised as 'redevelopment': "replacing an existing in-use building(s) (fully or partly) with a new building(s)." Development on vacant or disused brownfield sites is categorised as 'new development' alongside greenfield sites, indicating that the test is whether the site is currently in use. The Consultation Document states that "proposals for new development on undefended land should only be consented in exceptional circumstances and meet the criteria in paragraph 10.10" (page 35 of TAN15 Consultation Document, Jan 2023). As such, a vacant building or an area that has already been cleared for development face challenges in obtaining planning permission. This area of concern may be clarified following consultation on the proposed TAN15; however, this highlights potential limitations on the

quantum of PDL sites allocated in the existing LDP that have already been cleared for development being carried over to the emerging LDP. It also creates a further risk for a Plan strategy that is overly reliant on sites in areas of flood risk.

Other broad locations for new housing growth

The maps provided in Appendix B provide a broad idea of where the development of employment and housing land could be focused were the option to be pursued. The flood related implications of the majority of PDL being located in Newport City Centre have been explained above and this constraint will, to some extent, impact on the ability to accommodate growth in some of the other broad locations for housing that have been identified. However, there are other constraints that will restrict the delivery of other proposed housing sites identified on the urban expansion, village focus and hybrid approach maps. The majority of the potential growth locations identified under options 2-4 do not propose allocating housing on existing Green Belt land, although we note that under the Village Focus scenario, one site (adjacent to Marshfield) would appear to encroach into the Green Belt. Furthermore, a number of the locations identified by the Village Focus and Urban Expansion scenarios fall within the area identified in Future Wales for consideration as a future Green Belt. To this end, we note that the area shown in the plans in Appendix B as “assumed area under consideration for new Green Belt” is very much reduced in size from that set out in Future Wales. Newport Council should provide clarity as to the reasons for this reduction and confirm whether Welsh Government has accepted the area of search that is now proposed. This is an important consideration as it could jeopardise the delivery of a number of proposed growth areas.

It is further noted that under the Village focus scenario, a number of broad locations for growth are located within areas of existing land constraints (e.g. SLA and Green Wedges). Whilst it is accepted that non-statutory/local designations could be amended as part of the RLDP process, Newport Council would need to provide evidence to show that these are the most suitable locations for development, that new housing could come forward without harm to the wider landscape, and that there are no alternative and preferable locations for growth.

Against the context of these constraints, the proposed development site at Llanwern

1. Represents the right location for growth:

- a. Benefitting from a strategic location that is well related to Newport;
- b. Being largely free from the risk of flooding, not designated or proposed for designation as a Green Belt, not sensitive from a landscape and ecological perspective, and not designated as best and most versatile agricultural land; and,
- c. Having limited heritage assets, and the ability to integrate these into the development. This freedom from constraints sets it apart from the majority of sites in Newport.

2. Has the capacity to accommodate housing and employment growth together with a range of community facilities, all set within a very high quality environment.

<p>3. Is able to integrate with sustainable transport options and benefit from an extensive active travel network;</p> <p>4. Offers considerable opportunities for biodiversity net gain;</p> <p>5. Will provide zero carbon ready buildings;</p> <p>6. Will respond to economic imbalances and deprivation issues, both locally and at a local authority level.</p> <p>This site would therefore perform very well if considered against the scoring matrix that is contained within the Growth and Spatial Options document.</p> <p>Of the options that have been identified in the Growth and Spatial Options document, we would favour the Hybrid Option, albeit that this should be viewed in the context of the concerns set out above regarding:</p> <ol style="list-style-type: none"> 1. The quantum of remaining PDL in Newport; and, 2. The viability and deliverability of housing in the city centre that is now constrained by flood risk designations. <p>The implication of this is that a meaningful quantification of brownfield capacity should be undertaken in order to ensure that the RLDP does not over-state the potential contribution of PDL and thereby threaten its ability to meet the identified housing requirement. The release of greenfield land will be essential to meet the future development needs of Newport. These should benefit from sustainable locations, be well related to the existing urban area and free from constraints.</p>	
<p>Scoring</p> <p>As is the case with the assessment of Growth Options, we are concerned that the assessment of Spatial Options is weighted against population and economic metrics, in favour of environmental considerations and there are a number of inconsistencies in the scores that have applied:</p> <ol style="list-style-type: none"> 1. It is unclear why the PDL-led approach is shaded green in relation to the economy and employment given that it recognises that the quantum of PDL is finite, that a lack of suitable sites may affect Newport's role as a Growth Area, and that this spatial option may affect employment options; 2. The relevance of the national policy to prioritise development of brownfield land to 'economy and employment' for the urban expansion and village focus options is not explained. The focus in this regard should be on the ability to accommodate sufficient growth. As presently drafted, the assessment would appear to conflate economic and environmental considerations. This is a matter of concern given that the assessment already appears to favour environmental considerations over socio-economic criteria. 3. The framing of potential effects is not the same for PDL and urban expansion / village focus. Whereas PDL-led development is viewed in a positive light because of its potential to improve access to facilities in local areas, the potential for urban expansion / village focus to improve active travel infrastructure in and around villages is not noted as a positive. 4. There appears to be an over-focus on improving access to facilities within the city rather than throughout the entire LPA area e.g. in suburban communities. For example, 'equality, diversity and 	<p>This assessment was produced for the purpose of the Growth and Spatial Options consultation, however the Integrated Sustainability Appraisal (ISA) assesses these in more detail.</p>

<p>inclusion' is given a green score for PDL-led development because of its potential to meet specific needs throughout the city. However, this objective is scored orange for the urban expansion development option because "investment in these new facilities, infrastructure and services may mean existing facilities, infrastructure and services are not enhanced within existing urban areas", with little consideration to the fact it may be beneficial to residents living outside of the city centre, for example by enhancing access to facilities and/or improving the sustainability of existing services. New urban extension developments will form part of the city and will interact positively with neighbouring existing communities. They will provide new facilities that will be available to existing as well as new residents and will provide enhanced active travel and public transport infrastructure.</p> <p>5. There is repetition and an overlap in some of the comments between different objectives, e.g. comments relating to air quality management areas being placed under 'health and wellbeing' and under 'transport and movement'. Whilst it is recognised that there is naturally an overlap between objectives, more thought should be given to their placement to avoid an effective double-counting resulting in certain options receiving a worse rating.</p> <p>6. No specific regard appears to have been given to access to housing and the delivery of affordable housing in particular. Whilst these issues are contained within the population and communities category, they are lost alongside a number of other matters (the provision of "the necessary social, environmental, cultural and physical infrastructure to provide safe and healthy places for people that maintain and enhance community and settlement identities"). Given the critical need for increased housing delivery, we consider that it should be identified as a specific objective and considered separately to the broader theme of population and communities.</p> <p>7. We also note that no specific consideration has been given to freedom from flood risk in the assessment of spatial options. This a fundamental omission given that this represents such a significant barrier to residential development and a major constraint in Newport.</p>	
<p>As with the assessment of Growth Options, no information is provided as to how the conclusions of this simplistic "traffic light" analysis will inform the next stages of the LDP process, other than to state that all of the options will be subject to the Sustainability Appraisal and further analysis. In advance of these next stages, it will be important that the Council provides further clarity to the way in which the various metrics are scored and that it ensures that a consistent approach to site assessment is provided. In particular, more equal weighting should be provided to the economic and social factors in order to reflect the status of Newport as part of the National Growth Area.</p>	<p>Noted. The Spatial Option taken forward is discussed in detail in the Preferred Strategy Cabinet Paper, the Preferred Strategy Consultation Paper and associated background papers.</p>
<p>EVIDENCE BASE:</p> <p>11. Are there any other pieces of evidence that you believe should inform the development of the preferred growth and spatial options strategies?</p> <p>12. Are there any other comments you'd like to make regarding anything within this consultation document? Do you agree with the Objectives for the RLDP? If not, how and why do you think they should be changed?</p>	

In progressing work on the RLDP, we consider that Newport Council should undertake a review of existing LDP allocations that have not been delivered and that could be rolled forward into the RLDP in order to demonstrate that they are likely to be delivered. This reflects the guidance in Table 18 of the Development Plans Manual:

“Allocations rolled forward from a previous plan will require careful justification for inclusion in a revised plan, aligning with PPW. There will need to be a substantial change in circumstances to demonstrate sites can be delivered and justify being included again. Clear evidence will be required that such sites can be delivered. The sites should be subject to the same candidate site process requirements as new sites i.e. they must be demonstrated to be sustainable and deliverable. If an LPA wishes to retain such sites but cannot evidence they will be delivered, i.e. for aspirational or regeneration purposes, they can still be allocated in the plan but not relied upon as contributing to the provision. It will not be appropriate to include such sites in the windfall allowance. They should be treated as ‘bonus sites’”

As set out above, given the importance of ensuring an adequate supply of housing and affordable housing in particular, we consider that this should be framed into a separate objective rather than being included as part of the broader population and communities objective. Although a relatively minor alteration, this would reflect the critical importance of ensuring an adequate housing delivery in Newport over the RLDP period and will ensure that the growth and spatial options are assessed in the context of this key priority.

In respect of the proposed development at north of Llanwern, we provide the additional information in the form of the following documents to further demonstrate its sustainability, deliverability and freedom from constraints. These factors set it apart from the other identified areas of search:

1. Landscape assessment;
2. Ecology update note;
3. Heritage assessment;
4. Archaeological assessment; and,
5. Agricultural land classification assessment.

We also provide an updated version of the red line site location plan. The previous site location plan excluded a broadly triangular area of land (which extended to c.6ha) to the north of the site. This has now been confirmed as forming part of Welsh Government’s ownership and can therefore form part of any future development on the site. Although the inclusion of this area of land will not have any significant impact on the overall development capacity of the site, it will allow for a more integrated masterplanning solution to be achieved.

In respect of the accessibility of the proposed development, we note that the South East Wales Transport Commission recommended that:

1. Plans for a new station at Llanwern should be endorsed (recommendation 6); and,
2. Llanwern village, Ringland and Lliswerry should be provided with good walking and cycling access to Llanwern station (recommendation 24).

Noted, the Preferred Strategy Cabinet Paper, the Preferred Strategy Consultation Paper and associated background papers provide greater detail on this.

<p>The estimated delivery timescale for these recommendations is 2021-29, i.e. by the time that housing would be expected to come forward on the site. This supports the mobility strategy for the site and underlines the sustainability of the proposed development.</p> <p>[Documents also included:</p> <ul style="list-style-type: none"> • 1662-Ecology Update Note 030323 • 63760-02 Final Llanwern Archaeology Appraisal DBA 24-02-23o • 63760-02 Final Llanwern LDP Promotion Built Heritage Appraisal 24-02-23 • 220807.Langstone Lane Llawern ALC Report.23.v2 • Incola 1048 R01a Llanwern Landscape Tech Report 03.03.2023 • LF63760 - Llanwern - Site Location - 03.03.2023] 	
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GSO 030 - The John Family - 00169

Question / Response	Officer Response
<p>We set out herein our client's response to the Newport Local Development Plan (rLDP) Growth and Spatial Options consultation paper. Our client, the John Family, owns land at Cwrt Camlas, High Cross, that has been promoted for development through the LDP. Our clients are pleased to be able to have the opportunity to feed into the early stages of the Plan preparation process and hopes that their input is helpful in forming the key components of the Plan.</p> <p>Our clients are pleased to be able to have the opportunity to feed into the early stages of the plan preparation process and hopes that our input is helpful in forming the key components of the Plan.</p> <p>Summarily, our client's site is 2.91 ha in size and is situated to the northwest of Junction 27 of the M4 and comprises grazing land. A master planning exercise has been undertaken with input from a prospective developer and housing association that demonstrates it can potentially accommodate c. 70 dwellings. Development of the site will also provide potential improvements to facilities associated with the adjoining Children's Centre given its increasing importance as a resource for the local area.</p> <p>To the south the site immediately adjoins the recently constructed Serennu Children's Centre and housing estate of Cwrt Camlas and is bound to the west by existing housing on Cwm Lane. The northern boundary of the site is defined by Pensarn Farm Lane, whilst the eastern boundary is defined by hedgerows separating the site from further grazing land which is also in the ownership of our clients.</p> <p>Prospective housebuilders and housing associations have fed into the submitted proposals and our clients would welcome discussions with the Council on the contribution that the site can make towards</p>	<p>Noted. Candidate Site assessments are being carried out as part of a separate process. The results of the Stage 1 assessment can be found in the Candidate Site's Register. Stage 2 of the assessment will be published as part of the Preferred Strategy consultation.</p>

<p>the Plan. Indeed, our client is keen to demonstrate that the site would be deliverable, viable and sustainable such that they can provide a timetable for delivery to feed into the Council's trajectory both on terms of private and affordable homes.</p> <p>Our client's response to the Growth and Spatial Options consultation is set out below and is to be considered against their overarching role which is to assist the Authority in achieving the objectives of the LDP and the Future Wales aspiration for Newport to increase its Strategic Role in the region.</p>	
<p>GROWTH OPTIONS: Growth Scenarios - 1. Are there any scenarios that have been discounted which should be considered further, and why?</p>	
<p>We are strongly of the view that it is appropriate to discount the low growth options. In this regard, Policy 33 of Future Wales states that the Welsh Government support an "increased strategic role" however this cannot be a continuation of its existing role or approach towards growth and the benefits that it can bring, rather it requires enhanced levels of growth and investment.</p> <p>Table 1 provides a useful point of reference for establishing how an increased strategic role may be facilitated. Clearly in order to comply with Future Wales the Plan requires a level of growth that is at the very least equal to or greater than the current LDP level of growth, as such it can not be justified removing the PG Short Term level of growth. Whilst they are very similar, this along with the Dwelling Led 5yr level are the only two approaches that would seek a higher level of growth than is presently the case and therefore comply with Future Wales, all of the others would imply a reduced strategic role.</p> <p>Notwithstanding this, we accept the Council's reasons for discounting at this stage in order to avoid duplication of consideration. We set out the reasons for a higher level of growth in more detail in our answer to question 2 below.</p>	<p>Noted. The Growth Option taken forward is discussed in detail in the Preferred Strategy Cabinet Paper, the Preferred Strategy Consultation Paper and associated Background Papers.</p>
<p>2. Which of the options do you feel is the most appropriate, and why?</p>	
<p>It is clear that the only two options that are appropriate, in line with Future Wales and an increased Strategic Role for Newport are those that are higher than the existing LDP level and in this regard we strongly believe that the Dwelling Led 5yr level is the most appropriate. It is clear that Future Wales anticipates Newport growing "in and immediately adjoining" the settlement and an increased strategic role for the city. As such it is key that an aspirational level of growth is sought that seeks to drive the increase to reflect the strategic role that Newport plays and to drive the regional economy.</p> <p>We would note that Wales as a whole is facing its most significant challenges for some considerable time and it is without question the case that the Replacement LDP is being prepared under some of the most challenging societal and economic conditions since World War Two.</p>	<p>Noted. The Growth Option taken forward is discussed in detail in the Preferred Strategy Cabinet Paper, the Preferred Strategy Consultation Paper and associated Background Papers.</p>

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<p>There are numerous factors providing the context for the level of growth sought which we believe point towards the higher levels. We set these out summarily below but note their importance in a higher growth requirement.</p>	
<p><u>Post Covid 19 recovery, energy crisis and Brexit</u> It is clear that Newport faces significant challenges in order to achieve an increased strategic role in the context of the post Covid economy, Brexit Recovery and the ongoing energy crisis. Indeed, over recent years we have experienced exceptional circumstances that have the potential to severely and drastically impact upon the economy and society as a whole. We are strongly of the view that the planning process must play its part in helping to facilitate the economic recovery that is needed. Plainly economic recovery must form an over-riding requirement of the plan and without question must underlie the approach to be taken. An appropriate response to achieve an increased strategic role would be to plan for higher levels of growth than over recent plan periods.</p>	<p>Noted. The Growth Option taken forward is discussed in detail in the Preferred Strategy Cabinet Paper, the Preferred Strategy Consultation Paper and associated Background Papers.</p>
<p><u>Constraints in adjoining Authorities</u> In addition to meeting its own needs the Council will need to consider the lack of housing supply in neighbouring Authorities. Indeed, Future Wales is also clear that "Growth at Newport will help manage the development pressures in the region by providing a strategic growth focus for the eastern part of the area". Newport has not just been dealing with its own needs in recent years and accordingly needs to consider the offsets from new homes not being provided in its neighbouring authorities. Whilst housing and supply requirements were formally abandoned by the Welsh Government, it does not change the record of poor delivery elsewhere and it follows logically that where needs aren't met within an Authority, they will need to be accommodated somewhere. Whilst this is an unsatisfactory and unsustainable position there is unlikely to be any change in this in the short term. Indeed:</p> <ul style="list-style-type: none"> - Torfaen & Caerphilly - as of April 2021 there was a cumulative shortfall across the two Authorities of over 4,000 dwellings from the levels envisaged within their respective Local Development Plans. This represents the number of households that could not be provided for in those respective Authorities. This is a shortfall of national significance that has a profound effect on house prices across the region; and - Monmouthshire - representations made by the Welsh Government on the Monmouthshire rLDP mean that further new housing allocations would not be needed in Monmouthshire. Given the additional constraints in Monmouthshire, including Phosphates and anticipated marine nitrates, it is likely that demand will be displaced from Monmouthshire to adjoining Authorities. <p>Plainly, policy and supply constraints in adjoining Authorities will have a significant impact upon Newport City Council in respect of the housing market and affordability issues. This is a challenge that the LDP needs to respond to with higher growth rates than previous years in order to achieve an increased strategic role.</p>	<p>Noted. NCC is supportive of cross council working and joint working and effectively tackling cross boundary issues.</p> <p>The Growth Option taken forward is discussed in detail in the Preferred Strategy Cabinet Paper, the Preferred Strategy Consultation Paper and associated Background Papers.</p>

<p><u>Meeting needs</u></p> <p>It will be of utmost importance to ensure Newport establishes a level of growth that meets needs and does not exacerbate the existing supply constraints in South Wales, taking into consideration the shortfalls in adjoining Authorities alongside Newport's own needs. We believe that the highest level of growth will need to be set in order to meet the Vision and fulfil the strategic aspirations for Newport as a Gateway City to Wales. In this regard it is noted that:</p> <p>-given the potential impacts of Covid 19 on the economy and society, there will be a need to adopt a highly ambitious strategy which provides far greater flexibility to respond to the crisis through added stimulation of the construction sector;</p> <p>-account should be taken in the baseline figures of the levels of sustainability and selfcontainment that can be achieved through embracing working from home trends for those sectors where it is feasible. These are often the high added value jobs that are no longer tied to cities such as Bristol or Cardiff but can retain expenditure in the local area and encourage vibrant local areas; and</p> <p>-any requirement should ensure an appropriate level of flexibility for delivery indeed, it may be that a 20% flexibility allowance or greater provides an appropriate starting point. We will comment on this further when detailed information becomes available.</p>	<p>Noted. The Growth Option taken forward is discussed in detail in the Preferred Strategy Cabinet Paper, the Preferred Strategy Consultation Paper and associated Background Papers.</p>
<p><u>Addressing affordability</u></p> <p>The Council's result in nearly achieving its affordable housing target for 2015-2020 is to be welcomed. However, the Council recognise that this is only a small proportion of the actual level of need. The latest Local Housing Market Assessment (LHMA) indicates that "as of the 31st March 2017 there were 6,838 households with active applications on the housing waiting list. In order to clear this backlog during the 5 year life of this LHMA we would need to allocate 1,368 units of accommodation each year". The final stated annual shortfall is 559 per annum which equates to 2,795 over the five year period. This is plainly a significant issue within the Authority which has no doubt been exacerbated by price increases that have been caused due to shortages of housing supply outside of the County.</p> <p>Our client is of the view that the replacement LDP provides an opportunity to seek to address affordability in a meaningful and substantive way.</p>	<p>Noted</p>
<p>3. Are there any other matters that should be taken account of when assessing these scenarios and identifying a Preferred Strategy?</p>	
<p>We have considered the assessment of each of the options and have commented where we believe that the assessment could be reviewed. Importantly, with regards to the lower growth options that are considered (options 2 to 6) in the first instance, we do not believe that these will contribute towards the Future Wales aim for Newport to have an increased Strategic Role in South Wales. This should form part of the assessment.</p>	<p>Noted. The Growth Option taken forward is discussed in detail in the Preferred Strategy Cabinet Paper, the Preferred Strategy Consultation Paper and associated Background Papers.</p>

<p><u>Option 1: 12,570 new homes and 12,945 jobs</u></p> <p>With regards to the higher growth option we have suggested that a number of the "colours" should be improved based on the potential for positive outcomes. Indeed, greater levels of investment in line with an Increased Strategic Role for Newport would have the potential to bring many significant benefits across the assessment areas. We are strongly of the view that this is the only option that would allow Newport to strive towards an increased Strategic Role in line with Future Wales. Our analysis is below.</p>		<p>This assessment was produced for the purpose of the Growth and Spatial Options consultation, however the Integrated Sustainability Appraisal (ISA) assesses these in more detail.</p>
Economy & Employment	We support the overall conclusions of this assessment	
Population & Communities	We support the overall conclusions of this assessment	
Health & Well Being	We support the overall conclusions of this assessment	
Equality, Diversity and Inclusion	We support the overall conclusions of this assessment	
Transport & Movement	<p>Newport has been identified as a location for growth within Future Wales specifically because it is a sustainable location for growth. Its communities are well connected to public transport and well served by facilities. Indeed, our client's site at Cwrt Camlas is a clear example of this.</p> <p>We note that it is indicated that more opportunities for investment could be apparent under high scenarios, we believe that the Council's assessment should be more positive on this - indeed, higher levels of growth would enable a step change in investment and enhancement that could be a significant benefit. This should be re-assessed as green. Indeed, this is far more likely to be the case than for small scale, incremental and piecemeal infill development and ad-hoc brownfield sites.</p>	
Natural Resources	<p>We are surprised by the comments set out herein, it is noted that water consumption would increase for all options however, there are sustainable means of managing this.</p> <p>Much of the landscape surrounding Newport (where it is not at risk of flooding) is heavily influenced by negative urban impacts. New greenfield sites can provide a means of softening urban edges through more appropriate landscape buffers, open space and interface with rural areas.</p> <p>We also support the notion that greater investment brings the potential for more sustainable lifestyles, as greater facilities would exist and as construction techniques evolve and progress.</p>	

	We are strongly of the view that with appropriate planning interventions, this could be at least an orange category if not green.	
Biodiversity and Geodiversity	Again the categorisation red seems inappropriate (Option 5 and 6 are green) yet brownfield sites have equal (if not greater) chance of disturbing habitats and actually being unable to adequately mitigate. There is significant opportunity to provide ecological enhancement and net gain from greenfield sites, this includes to Sites of Importance for Nature Conservations (SINCs).	
Historic Environment	We would note that each case would need to be dealt with based on its own merits, albeit there are more heritage assets (including Listed Buildings and Conservation Areas) within the urban area than there are in surrounding green fields.	
Landscape	As noted earlier much of the landscape surrounding Newport (where it is not at risk of flooding) is heavily influenced by negative urban impacts. New greenfield sites can provide a means of softening urban edges through more appropriate landscape buffers, open space and interface with rural areas.	
Climate change	With regards to Flooding, there are considerable issues for existing properties in Newport, growth means higher investment and the potential to contribute towards solving existing problems. Increased investment in local facilities would mean potentially increasing sustainability. A higher growth strategy will actively prevent growth being dispersed. Indeed, low growth means that people would "jump" the green belt - leading to greater in commuting or travel to Bristol and Cardiff.	
<p>With regards to the remaining options, we note: <u>Option 2: 9,450 new homes and 10,695 Jobs & Option 3: 9,570 new homes and 8,640 jobs</u> Given the similar scale of growth we consider both options in the following table in order to minimise duplication. It is noted in the first instance that these would be contrary to the Future Wales aspiration for Newport to achieve an increased strategic role.</p>		This assessment was produced for the purpose of the Growth and Spatial Options consultation, however the Integrated Sustainability Appraisal (ISA) assesses these in more detail.
Economy & Employment	We support the overall conclusions of this assessment	
Population & Communities	We support the overall conclusions of this assessment	
Health & Well Being	We support the overall conclusions of this assessment	

Equality, Diversity and Inclusion	We support the overall conclusions of this assessment	
Transport & Movement	We support the overall conclusions of this assessment	
Natural Resources	As with option 1, we are surprised by the comments set out herein, it is noted that water consumption would increase for all options however, there are sustainable means of managing this. In addition, much of the landscape surrounding Newport (where it is not at risk of flooding) is heavily influenced by negative urban impacts. New greenfield sites can provide a means of softening urban edges through more appropriate landscape buffers, open space and interface with rural areas. We also support the notion that greater investment brings the potential for more sustainable lifestyles, as greater facilities would exist and as construction techniques evolve and progress. We are strongly of the view that with appropriate planning interventions, this could be at least an orange category if not green.	
Biodiversity and Geodiversity	Again the categorisation seems inappropriate (Option 5 and 6 are green) yet brownfield sites have equal (if not greater) chance of disturbing habitats and actually being unable to adequately mitigate. There is significant opportunity to provide ecological enhancement and net gain from greenfield sites, this includes to SINCs and Special Areas of Conservation (SACs).	
Historic Environment	It is unclear why options 2 and 3 are scored differently. We would note that each case would need to be dealt with based on its own merits, albeit there are more heritage assets (including Listed Buildings and Conservation Areas) within the urban area than there are in surrounding greenfield.	
Landscape	We support the overall conclusions of this assessment	
Climate change	With regards to flooding, there are considerable issues for existing properties in Newport, growth means higher investment and the potential to contribute towards solving existing problems Increased investment in local facilities would mean potentially increasing sustainability. A higher growth strategy will actively prevent growth being dispersed. Indeed, low growth means that people would "jump" the green belt - leading to greater in commuting or travel to Bristol and Cardiff.	

Option 4: 7,950 new homes and 9,405 Jobs, Option 5: 8,100 new homes and 6,720 jobs & Option 6:7,605 new homes and 5,835 jobs
 Given that Options 4, 5 and 6 are low growth options with broadly similar levels of new homes, we set out our combined comments on these options below in order to avoid duplication. It is noted in the first instance that these would be contrary to the Future Wales aspiration for Newport to achieve an increased strategic role.

This assessment was produce for the purpose of the Growth and Spatial Options consultation, however the Integrated Sustainability Appraisal (ISA) assesses these in more detail.

Economy & Employment	We are of the view that these low growth options should all be categorised as red as they would not provide the combination of jobs and homes required to provide an increased strategic role for Newport
Population & Communities	We are of the view that these low growth options should all be categorised as red as they would not provide the combination of jobs and homes required to provide an increased strategic role for Newport
Health & Well Being	At the lower scales of growth these options are unlikely to provide the investment required in such facilities rather it would be a continuation of existing levels.
Equality, Diversity and Inclusion	We support the overall conclusions of this assessment however,question whether this should be red given the importance of meeting needs.
Transport & Movement	With each option there would be fewer opportunities for significant levels of investment in improved infrastructure or sustainable means of travel.
Natural Resources	It is clear that lower growth levels would require less greenfield land which would clearly result in a continuation of the existing urban / rural interface. However, there are areas that could benefit from new landscaping / planting to soften the interface and provide visual benefits in this regard.
Biodiversity and Geodiversity	The categorisation seems inappropriate and it is unclear why options 5 and 6 are green yet brownfield sites have equal (if not greater) chance of disturbing habitats and actually being unable to adequately mitigate due to more limited land availability on site. They do not have the same level of opportunity to provide ecological enhancement and net gain as greenfield sites, this includes to SINC's and SAC's.
Historic Environment	We would note that each case would need to be dealt with based on its own merits, albeit there are more heritage assets (including Listed Buildings and Conservation Areas) within the urban area than there are in surrounding greenfield.

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Landscape	It is clear that lower growth levels would require less greenfield land which would clearly result in a continuation of the existing urban / rural interface. However, there are areas that could benefit from new landscaping / planting to soften the interface and provide visual benefits in this regard.	
Climate change	With regards to Flooding, there are considerable issues for existing properties in Newport, growth means higher investment and the potential to contribute towards solving existing problems There would potentially be less investment in sustainability. Lower growth is likely to contribute towards increased commuting whereby people would be priced out of the local market and "jump" the greenbelt to alternative locations where homes are available.	
EMPLOYMENT LAND OPTIONS:		
Recommendation One -		
4. Is this requirement appropriate for Newport?		
We are supportive of the recommendations of the Employment Land Review which seek to protect 157.8 ha of supply in order to achieve the 77ha requirement. We believe that this approach provides flexibility to achieve the Future Wales approach towards increasing the Strategic Role of Newport.		Noted
5. Should it be different and if so, why?		
As noted above, we support the recommendations of the Employment Land Review.		Noted
Recommendation Two –		
6. Should some sites be removed from the employment supply? Why?		
The Employment Land Review recommends that all the sites listed in Table E1 of the Executive Summary are retained within the RLDP, this includes both the Solutia Site and Queensway Meadows, therefore it is unclear why their removal is being considered, further clarity over this would be required in order for us to consider further but based on the evidence available to date we oppose the removal of employment land. It is noted that if Newport is to achieve its increased Strategic Role, it is imperative that it is providing a balance of jobs and homes and a significant supply of deliverable land for both purposes is available.		Noted. The Employment Land Review (NB not executive summary) discusses this in more detail, including the recommendations regarding East of Queensway Meadows at section 8.8.
7. Should alternative land uses be considered for some sites? Please provide examples of such uses and your rationale for this.		
Given our response to question 6, we have no further comments on this question.		Noted
Spatial Options		
SPATIAL OPTIONS:		
8. Which of these options do you feel is the most appropriate, and why?		

<p>We consider that the urban expansion option provides the most appropriate solution, this is framed on our approach towards growth which is based on the higher growth option (1) being the only approach that would be in compliance with Future Wales (i.e. an increased strategic role for Newport). For this reason we believe that the previously developed land (PDL) approach and Village Focus approaches should both be ruled out at this stage.</p>		<p>Noted. The Spatial Option taken forward is discussed in detail in the Preferred Strategy Cabinet Paper, the Preferred Strategy Consultation Paper and associated Background Papers.</p>
<p><u>Urban Expansion & Hybrid Options</u></p> <p>We note that there are various overlaps between the Urban Expansion and Hybrid Options, and we consider them jointly in the below table given the similarities. Indeed, we believe that given the lack of large suitable previously developed sites that may be available as new allocations, the PDL element is likely to be comprised of those existing allocations that are proven to be deliverable and capable of being rolled over alongside a small scale windfall assumption. As such with both options the amount of greenfield expansion land is likely to be similar given the scale of growth required in order to meet the strategic role of the City. However, we note that in respect of villages, it is likely to only be appropriate to consider small scale development parcels to meet local needs, rather than any significant scale of expansion.</p>		
<p>Our comments in respect of the assessment of both is set out below.</p>		<p>This assessment was produced for the purpose of the Growth and Spatial Options consultation, however the Integrated Sustainability Appraisal (ISA) assesses these in more detail.</p>
<p>Economy & Employment</p>	<p>Future Wales is clear that growth should be in and around Newport. As such, this approach would clearly be in line with the policy hierarchy. It is noted that over recent years there has been a concentration of development in the east of the City, there would be an opportunity with urban expansion to re-focus on the west, north west and north of the City. We are strongly of the view that this should be green for both the Urban Expansion option and the Hybrid Option. Population & Communities We support the overall conclusions of this assessment with respect to Urban Expansion and believe that the same conclusions could be drawn from the Hybrid Option due to the fact that a similar quantum of greenfield development will be required in both scenario.</p>	
<p>Health & Well Being</p>	<p>We support the overall conclusions of this assessment with respect to the Hybrid Option but believe that the same conclusions could be drawn from the Hybrid Option due to the fact that a similar quantum of greenfield development will be required in both scenario.</p>	
<p>Equality, Diversity and Inclusion</p>	<p>We believe that for both Urban Expansion and Hybrid Options, the assessment should be green. Indeed, both will facilitate significant opportunities for improvements and this should not be down played.</p>	
<p>Transport & Movement</p>	<p>Newport has been identified as a location for growth within Future Wales specifically because it is a sustainable location for growth. Its communities are</p>	

	well connected to public transport and well served by facilities. We note that it is indicated that more opportunities for investment could be apparent under high scenarios, we believe that the Council's assessment should be more positive on this – indeed, higher levels of growth would enable a step change in investment and enhancement that could be a significant benefit. This should be re-assessed as green. Indeed, this is far more likely to be the case than for small scale, incremental and piecemeal infill development and ad-hoc brownfield sites.	
Natural Resources	We are surprised by the comments set out herein, it is noted that water consumption would increase for all options however, there are sustainable means of managing this. Much of the landscape surrounding Newport (where it is not at risk of flooding) is heavily influenced by negative urban impacts. New greenfield sites can provide a means of softening urban edges through more appropriate landscape buffers, open space and interface with rural areas. This has been actively demonstrated on our clients site. We also support the notion that greater investment brings the potential for more sustainable lifestyles, as greater facilities would exist and as construction techniques evolve and progress. We are strongly of the view that with appropriate planning interventions, this could be at least an orange category if not green.	
Biodiversity and Geodiversity	Again the categorisation seems inappropriate yet brownfield sites have equal (if not greater) chance of disturbing habitats and actually being unable to adequately mitigate. There is significant opportunity to provide ecological enhancement and net gain from greenfield sites, this includes to SINC's. This is demonstrated by work undertaken on our client's site, where there are significant opportunities for betterment.	
Historic Environment	We would note that each case would need to be dealt with based on its own merits, albeit there are more heritage assets (including Listed Buildings and Conservation Areas) within the urban area than there are in surrounding green fields. Sites within our client's control would have no impacts on heritage assets.	
Landscape	As noted earlier much of the landscape surrounding Newport (where it is not at risk of flooding) is heavily influenced by negative urban impacts. New greenfield sites can provide a means of softening urban edges through more appropriate landscape buffers, open space and interface with rural areas.	

Climate change	With regards to Flooding, there are considerable issues for existing properties in Newport, growth means higher investment and the potential to contribute towards solving existing problems. As such, sites such as our clients where flooding is not a constraint but are in sustainable locations form a solution to this and cannot be considered negative. Increased investment in local facilities would mean potentially increasing sustainability. Appropriate levels of growth being identified would prevent growth being dispersed across numerous local authorities which has happened over recent years due to supply constraints. Low growth means that people would “jump” the green belt – leading to greater in commuting or travel to Bristol and Cardiff.	
10. Are there any other matters that should be given consideration when assessing these?		
In supporting our assessment of both the highest growth option and spatial approach which requires greenfield land, we set out below a number of key considerations in the benefits that they can bring. In particular in helping Newport to achieve an increased strategic role but also in terms of the other key assessment areas.	Noted	
<p><u>Sustainable growth locations</u></p> <p>It is inevitably the case that the supply of brownfield sites in Newport for redevelopment for residential purposes is limited. As such, the Council will need to consider sustainable and appropriate greenfield locations based around existing communities. In reality this is likely to focus on the western and north western parts of the County extents associated with existing built form and communities. Indeed, we are of the view that the LDP must not neglect the requirements of these existing communities in favour of more remote areas on the Eastern side of the City that would be more aligned to commuting patterns along the M4.</p> <p>It is anticipated that such focal points for proportionate growth include a number of existing communities where there are a number of local facilities that can provide an opportunity to maximise levels of self-containment and sustainability. Indeed, proportionate growth can help to reinforce existing levels of sustainability but also seek to provide additional facilities and uses that can move to a greater level of neighbourhood and community well-being. In this regard, our clients consider that High Cross is a suitable location for proportionate sustainable growth.</p>	The Deposit Plan will include reviewed urban and village boundaries.	
<p><u>High Cross</u></p> <p>It is considered that High Cross is a sustainable location for proportionate growth but there are very limited opportunities for such development with the exception of our client’s site. Indeed, their site is immediately adjacent to the recently constructed Serennu Children’s Centre and housing estate of Cwrt Camlas which laid access points into their land when it was constructed in anticipation that it forms a logical follow on.</p>	The Deposit Plan will include reviewed urban and village boundaries.	

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

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

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

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

The Serennau Children's Centre is located less than 100m from the site and provides activities and leisure uses for its users. Associated infrastructure includes a Multi-Use Games Area and two play parks.

The site is provided by the National Health Service, a public body, thus it is assumed that this area is available for public use.

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

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

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

Four bus stops are located within 550m of the site along High Cross Road, offering access to routes 56 and R1. Bus route 56 operates between Newport and Tredegar, providing 14 weekday services in each direction. Bus route R1 operates between Newport and Risca, providing 11 weekday services in each

direction. It takes approximately 15 minutes to reach Newport Bus Station via either of these routes, whereby a greater number of bus services offer access to a wider vicinity, including Cardiff, Chepstow and Monmouth.

The nearest rail station is located at Pye Corner, 1.3km walking distance south of the subject site. The station is located along the South Wales Valleys Line, which serves a number of routes surrounding Cardiff and the Valleys. More specifically, Pye Corner is situated on the Ebbw Vale Town – Treherbert line which travels via Cardiff Central. Westbound, this service operates between 07:13 and 23:17 providing 17 weekday services and eastbound this service operates between 06:16 and 21:33 providing 16 weekday services. The South Wales Valleys Line serves a greater number of local destinations, albeit these routes may require some changes.

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

The wide array of local facilities afford an opportunity for future residents to maximise the proportion of their everyday lives within their local neighbourhood without relying upon the need for private car trips.

It is considered an appropriate location for the provision of proportionate growth that would complement existing facilities and will provide more opportunities for local people to remain in the area. Importantly it would contribute to addressing a number of the issues set out within each of the draft Objectives in particular by virtue of the fact that it would be providing homes in a sustainable location that it is well linked to existing facilities and both active and public transport networks. It will:

1. Provide a modest scale of development for local people along with much needed affordable housing;
2. Support and enhance existing facilities and services through providing homes in an appropriate location;
3. Provide an opportunity to focus development in a sustainable location that is well served by public transport and within easy reach of a wide range of facilities, helping to create a move away from reliance upon the private car;
4. Capitalise on its location in close proximity to the canal to the north and the recreational benefits associated. The site's location, in proximity to a number of walkable local services, alongside proximity to Fourteen Locks, presents an opportunity to develop a residential scheme with an array of leisure and recreational offerings available within walking distance.
6. Provide enhanced facilities for the Children's centre in particular providing additional storage area and overspill car parking. It is noted that many of the users (parents and children along with

<p>specialist Doctors and Care Givers) cannot use public transport for various reasons and are reliant upon travelling to the Centre by car;</p> <p>7. Adopt an approach to design that reflects the traditional local character, density and appearance; and</p> <p>8. Make an appropriate use of a site that can be accommodated without harm to landscape or biodiversity but rather can formulate a strategy to help improve both. The illustrative masterplan includes landscape enhancements through a countryside green edge to the east and a vegetated buffer to the north. This will prevent impact on the existing uses and landscape features identified to the north of the site. Further, the parcel of land to the east of the site is demonstrated as benefitting from strategic woodland planting of native woodland and flowering fruit trees. Collectively, these enhancements seek to enhance the existing features of the natural landscape.</p>	
<p>Evidence Base EVIDENCE BASE:</p>	
<p>11. Are there any other pieces of evidence that you believe should inform the development of the preferred growth and spatial options strategies?</p>	
<p>It is noted that only limited evidence is currently available and it is clear that there will be a need to publish significantly more evidence in respect of matters such as supply of housing land.</p>	<p>Noted</p>
<p>12. Are there any other comments you'd like to make regarding anything within this consultation document? Do you agree with the Objectives for the RLDP? If not, how and why do you think they should be changed?</p>	
<p>We have commented previously on the Objectives of the RLDP and reserve the right to comment further once the updated Objectives are consulted upon.</p> <p>For ease of reference, it is noted that in general terms we are supportive of the overall approach towards the objectives, however, we believe that particular attention is needed with regards to economic and population / community objectives. As we have stated earlier, there are significant challenges ahead and it must be the role of the planning process to help address these issues rather than constrain recovery and realignment.</p> <p>We are strongly of the view that well planned greenfield sites can contribute towards a range of the key objectives not just in respect of population and communities, inclusive of:</p> <ul style="list-style-type: none"> -including a variety of housing types, tenures and densities; -providing a landscape structure that builds on existing assets, including green infrastructure within the development, linking urban areas to the countryside beyond and creating a distinctive edge to the urban area; -providing opportunities for people to work locally and for small businesses to set up, grow and thrive as well as providing homes for local workers; -addressing the challenges that exist in the aftermath of Brexit and Covid and ensure that Newport can embrace and facilitate new markets and technologies; -presenting an opportunity to design energy efficient communities; and 	<p>Noted. The Deposit Plan will include reviewed urban and village boundaries and green wedge designations.</p>

<p>-allowing pedestrian, cycle and public transport networks to be fully integrated, often improving services available to the adjacent communities, increasing health and well-being by reducing the reliance on cars.</p>	
<p>Other comments</p>	
<p>It is noted that our client is currently in the process of liaising with house builders and housing associations in respect of refining development proposals for the site. However, they would welcome engagement with the Council on whether they consider either site could play a role in the delivery of sustainable communities through the replacement LDP.</p>	<p>Noted.</p>

GSO 031 – Bronafon Housing Association – 00706

Question / Response	Officer Response
<p>We set out herein our client’s response to the Newport Local Development Plan (LDP) Growth and Spatial Options consultation paper. Our clients have an interest (or are in the process of establishing an interest) in a number of sites of various scales across Newport that they believe have the ability to provide sustainable and viable opportunities for meeting needs within the Authority</p> <p>It is noted that Bron Afon are a Registered Social Landlord (RSL) that have historically operated within Torfaen but in line with recent changes to the scope of RSL’s in Wales are looking to help meet local housing needs in adjoining Authorities. They control over 8,000 properties within Torfaen County Borough and have aspirations to deliver over 100 to 150 new dwellings per annum over the next five years and beyond across a range of Authorities of both social and private sales. In this regard, they are well placed to help Newport to deliver a sustainable and affordable supply of homes over the course of the period of the Replacement Plan.</p> <p>Our clients are pleased to have the opportunity to feed into the early stages of the plan preparation process and hope that their input is helpful in forming the key components of the Plan. Currently, our clients have an interest in a site at Castleton (Bakery Lane) that was submitted as a candidate site but are also at the early stages of liaising with other landowners that have submitted sites previously at Bettws, Rogerston, Basseleg and another site at Castleton with a view that they would contribute towards the delivery of the social housing element along with potential provision of private sales housing through their private sales arm which is in the process of being finalised. I with regards to Basseleg they have been in discussions with a number of landowners and option holders in the area with regards to a sustainable urban extension, a red line plan of this is included at appendix 1 for ease. Should the Council consider that this as a direction for growth Bron Afon and the other landowners would be happy to meet with the Council to discuss this area and how it can contribute towards the Plan.</p>	<p>Candidate Site assessments are being carried out as part of a separate process. The results of the Stage 1 assessment can be found in the Candidate Site’s Register. Stage 2 of the assessment will be published as part of the Preferred Strategy consultation.</p>

<p>The sites above are at varying stages in preparation of evidence but our clients would welcome discussions with the Council on each of the sites and the work that has been undertaken and would be required. Indeed, our clients would be keen to demonstrate the sites that they are working on would be deliverable, viable and sustainable such that they can provide a timetable for delivery to feed into the Council's trajectory both on terms of private and affordable homes. Our client's response to the Growth and Spatial Options consultation is set out below and is to be considered against their overarching role which is to assist the Authority in achieving the objectives of the LDP and the Future Wales aspiration for Newport to increase its Strategic Role in the region.</p>	
<p>Growth Options GROWTH OPTIONS: Growth Scenarios – 1. Are there any scenarios that have been discounted which should be considered further, and why?</p>	
<p>We are strongly of the view that it is appropriate to discount the low growth options. In this regard, Policy 33 of Future Wales states that the Welsh Government support an "increased strategic role" however this cannot be a continuation of its existing role or approach towards growth and the benefits that it can bring, rather it requires enhanced levels of growth and investment. Table 1 provides a useful point of reference for establishing how an increased strategic role may be facilitated. Clearly in order to comply with Future Wales the Plan requires a level of growth that is at the very least equal to or greater than the current LDP level of growth, as such it can not be justified removing the PG Short Term level of growth. Whilst they are very similar, this along with the Dwelling Led 5yr level are the only two approaches that would seek a higher level of growth than is presently the case and therefore comply with Future Wales, all of the others would imply a reduced strategic role. Notwithstanding this, we accept the Council's reasons for discounting at this stage in order to avoid duplication of consideration. We set out the reasons for a higher level of growth in more detail in our answer to question 2 below.</p>	<p>Noted. The Growth Option taken forward is discussed in detail in the Preferred Strategy Cabinet Paper, the Preferred Strategy Consultation Paper and associated Background Papers.</p>
<p>2. Which of the options do you feel is the most appropriate, and why?</p>	
<p>It is clear that the only two options that are appropriate, in line with Future Wales and an increased Strategic Role for Newport are those that are higher than the existing LDP level and in this regard we strongly believe that the Dwelling Led 5yr level is the most appropriate. It is clear that Future Wales anticipates Newport growing "in and immediately adjoining" the settlement and an increased strategic role for the city. As such it is key that an aspirational level of growth is sought that seeks to drive the increase the strategic role that Newport plays and drive the regional economy. We would note that Wales as a whole is facing its most significant challenges for some considerable time and it is without question the case that the Replacement LDP is being prepared under some of the most challenging societal and economic conditions since World War Two. There are numerous factors providing the context for the level of growth sought which we believe point towards the higher levels. We set these out summarily below but note their importance in a higher growth requirement.</p>	<p>Noted. The Growth Option taken forward is discussed in detail in the Preferred Strategy Cabinet Paper, the Preferred Strategy Consultation Paper and associated Background Papers.</p>

<p><u>Post Covid 19 recovery, energy crisis and Brexit</u></p> <p>It is clear that Newport faces significant challenges in order to achieve an increased strategic role in the context of the post Covid economy, Brexit Recovery and the ongoing energy crisis. Indeed, over recent years we have experienced exceptional circumstances that have the potential to severely and drastically impact upon the economy and society as a whole. We are strongly of the view that the planning process must play its part in helping to facilitate the economic recovery that is needed. Plainly economic recovery must form an over-riding requirement of the plan and without question must underlie the approach to be taken. An appropriate response to achieve an increased strategic role would be to plan for higher levels of growth than over recent plan periods.</p>	<p>Noted. The Growth Option taken forward is discussed in detail in the Preferred Strategy Cabinet Paper, the Preferred Strategy Consultation Paper and associated Background Papers.</p>
<p><u>Constraints in adjoining Authorities</u></p> <p>In addition to meeting its own needs the Council will need to consider the lack of housing supply in neighbouring Authorities. Indeed, Future Wales is also clear that “Growth at Newport will help manage the development pressures in the region by providing a strategic growth focus for the eastern part of the area”. Newport has not just been dealing with its own needs in recent years and accordingly needs to consider the offsets from new homes not being provided in its neighbouring authorities. Whilst housing land supply requirements were formally abandoned by the Welsh Government, it does not change the record of poor delivery elsewhere and it follows logically that where needs aren’t met within an Authority, they will need to be accommodated somewhere. Whilst this is an unsatisfactory and unsustainable position there is unlikely to be any change in this in the short term. Indeed:</p> <p style="padding-left: 40px;">Torfaen & Caerphilly – as of April 2021 there was a cumulative shortfall across the two Authorities of over 4,000 dwellings from the levels envisaged within their respective Local Development Plans. This represents the number of households that could not be provided in those respective Authorities. This is a shortfall of national significance that has a profound effect on house prices across the region; and</p> <p style="padding-left: 40px;">- Monmouthshire – representations made by the Welsh Government on the Monmouthshire LDP would mean that further new housing allocations would not be needed in Monmouthshire. Given the additional constraints in Monmouthshire, including Phosphates, it is likely that demand will be displaced from Monmouthshire to adjoining Authorities.</p> <p>Plainly, policy and supply constraints in adjoining Authorities will have a significant impact upon Newport Council in respect of the housing market and affordability issues. This is a challenge that the LDP respond to with higher growth rates than previous years in order to achieve an increased strategic role.</p>	<p>Noted. NCC is supportive of cross council working and joint working and effectively tackling cross boundary issues.</p> <p>The Growth Option taken forward is discussed in detail in the Preferred Strategy Cabinet Paper, the Preferred Strategy Consultation Paper and associated Background Papers.</p>
<p><u>Meeting needs</u></p> <p>It will be of utmost importance to ensure Newport establishes a level of growth that meets needs and does not exacerbate the existing supply constraints in South Wales, taking into consideration the shortfalls in adjoining Authorities alongside Newport’s own needs. Rather we are of the view that the</p>	<p>Noted. The Growth Option taken forward is discussed in detail in the Preferred Strategy Cabinet Paper, the Preferred Strategy Consultation Paper and associated Background Papers.</p>

<p>highest level of growth will need to be set in order to meet the Vision and fulfil the strategic aspirations for Newport as a Gateway City to Wales. In this regard it is noted that:</p> <ul style="list-style-type: none"> - given the potential impacts of Covid 19 on the economy and society, there will be a need to adopt a highly ambitious strategy which provides far greater flexibility to respond to the crisis through added stimulation of the construction sector; - account should be taken in the baseline figures of the levels of sustainability and self containment that can be achieved through embracing working from home trends for those sectors where it is feasible. These are often the high added value jobs that are no longer tied to cities such as Bristol or Cardiff but can retain expenditure in the local area and encourage vibrant local areas; and - any requirement should ensure an appropriate level of flexibility for delivery indeed, it may be that a 20% flexibility allowance or greater provides an appropriate starting point. We will comment on this further when detailed information becomes available. 	
<p><u>Addressing affordability</u></p> <p>The Council's result in nearly achieving its affordable housing target for 2015-2020 is to be welcomed. However, the Council recognise that this is only a small proportion of the actual level of need. The latest Local Housing Market Assessment (LHMA) indicates that "as of the 31st March 2017 there were 6,838 households with active applications on the housing waiting list. In order to clear this backlog during the 5 year life of this LHMA we would need to allocate 1,368 units of accommodation each year". The final stated annual shortfall is 559 per annum which equates to 2,795 over the five year period. This is plainly a significant issue within the Authority which has no doubt been exacerbated by price increases that have been caused due to shortages of housing supply outside of the County. Our clients are of the view that the replacement LDP provides an opportunity to seek to address affordability in a meaningful and substantive way.</p>	Noted
<p>3. Are there any other matters that should be taken account of when assessing these scenarios and identifying a Preferred Strategy?</p>	
<p>We have considered the assessment of each of the options and have commented where we believe that the assessment could be reviewed. Importantly, with regards to the lower growth options that are considered (options 2 to 6) in the first instance, we do not believe that these will contribute towards the Future Wales aim for Newport to have an increased Strategic Role in South Wales, this should form part of the assessment.</p>	Noted. The Growth Option taken forward is discussed in detail in the Preferred Strategy Cabinet Paper, the Preferred Strategy Consultation Paper and associated Background Papers.
<p><u>Option 1: 12,570 new homes and 12,945 jobs</u></p> <p>With regards to the higher growth option we have suggested that a number of the "colours" should be improved based on the potential for positive outcomes. Indeed, greater levels of investment in line with an Increased Strategic Role for Newport would have the potential to bring many significant benefits across the assessment areas.</p> <p>We are strongly of the view that this is the only option that would allow Newport to strive towards an increased Strategic Role in line with Future Wales.</p>	This assessment was produced for the purpose of the Growth and Spatial Options consultation, however the Integrated Sustainability Appraisal (ISA) assesses these in more detail.

Our analysis is below.		
Economy & Employment	We support the overall conclusions of this assessment	
Population & Communities	We support the overall conclusions of this assessment	
Health & Well Being	We support the overall conclusions of this assessment	
Equality, Diversity and Inclusion	We support the overall conclusions of this assessment	
Transport & Movement	Newport has been identified as a location for growth within Future Wales specifically because it is a sustainable location for growth. Its communities are well connected to public transport and well served by facilities. The sites that Bron Afon have an interest in are all in sustainable locations in respect of both local facilities and public transport. We note that it is indicated that more opportunities for investment could be apparent under high scenarios, we believe that the Council's assessment should be more positive on this – indeed, higher levels of growth would enable a step change in investment and enhancement that could be a significant benefit. This should be re-assessed as green. Indeed, this is far more likely to be the case than for small scale, incremental and piecemeal infill development and ad-hoc brownfield sites.	
Natural Resources	We are surprised by the comments set out herein, it is noted that water consumption would increase for all options however, there are sustainable means of managing this. Much of the landscape surrounding Newport (where it is not at risk of flooding) is heavily influenced by negative urban impacts. New urban extensions can provide a means of softening urban edges through more appropriate landscape buffers, open space and interface with rural areas. We also support the notion that greater investment brings the potential for more sustainable lifestyles, as greater facilities would exist and as construction techniques evolve and progress. We are strongly of the view that with appropriate planning interventions, this could be at least an orange category if not green	
Biodiversity and Geodiversity	Again the categorisation red seems inappropriate (Option 5 and 6 are green) yet brownfield sites have equal (if not greater) chance of disturbing habitats and actually being unable to adequately mitigate. There is significant	

	opportunity to provide ecological enhancement and net gain from greenfield sites, this includes to Sites of Importance for Nature Conservations (SINCs).		
Historic Environment	We would note that each case would need to be dealt with based on its own merits, albeit there are more heritage assets (including Listed Buildings and Conservation Areas) within the urban area than there are in surrounding green fields.		
Landscape	As noted earlier much of the landscape surrounding Newport (where it is not at risk of flooding) is heavily influenced by negative urban impacts. New urban extensions can provide a means of softening urban edges through more appropriate landscape buffers, open space and interface with rural areas		
Climate change	With regards to Flooding, there are considerable issues for existing properties in Newport, growth means higher investment and the potential to contribute towards solving existing problems Increased investment in local facilities would mean potentially increasing sustainability. A higher growth strategy will actively prevent growth being dispersed. Indeed, low growth means that people would “jump” the green belt – leading to greater in commuting or travel to Bristol and Cardiff.		
<p>With regards to the remaining options, we note: <u>Option 2: 9,450 new homes and 10,695 Jobs & Option 3: 9,570 new homes and 8,640 jobs</u> Given the similar scale of growth we consider both options in the following table in order to minimise duplication. It is noted in the first instance that these would be contrary to the Future Wales aspiration for Newport to achieve an increased strategic role</p>			This assessment was produce for the purpose of the Growth and Spatial Options consultation, however the Integrated Sustainability Appraisal (ISA) assesses these in more detail.
Economy & Employment	We support the overall conclusions of this assessment		
Population & Communities	We support the overall conclusions of this assessment		
Health & Well Being	We support the overall conclusions of this assessment		
Equality, Diversity and Inclusion	We support the overall conclusions of this assessment		
Transport & Movement	We support the overall conclusions of this assessment		
Natural Resources	As with option 1, we are surprised by the comments set out herein, it is noted that water consumption would increase for all options however, there are sustainable means of managing this. In addition, much of the landscape		

	surrounding Newport (where it is not at risk of flooding) is heavily influenced by negative urban impacts. New urban extensions can provide a means of softening urban edges through more appropriate landscape buffers, open space and interface with rural areas. We also support the notion that greater investment brings the potential for more sustainable lifestyles, as greater facilities would exist and as construction techniques evolve and progress. We are strongly of the view that with appropriate planning interventions, this could be at least an orange category if not green.		
Biodiversity and Geodiversity	Again the categorisation seems inappropriate (Option 5 and 6 are green) yet brownfield sites have equal (if not greater) chance of disturbing habitats and actually being unable to adequately mitigate. There is significant opportunity to provide ecological enhancement and net gain from greenfield sites, this includes to SINCs and Special Areas of Conservation (SACs)		
Historic Environment	It is unclear why options 2 and 3 are scored differently. We would note that each case would need to be dealt with based on its own merits, albeit there are more heritage assets (including Listed Buildings and Conservation Areas) within the urban area than there are in surrounding greenfield.		
Landscape	We support the overall conclusions of this assessment		
Climate change	With regards to flooding, there are considerable issues for existing properties in Newport, growth means higher investment and the potential to contribute towards solving existing problems. Increased investment in local facilities would mean potentially increasing sustainability. A higher growth strategy will actively prevent growth being dispersed. Indeed, low growth means that people would “jump” the green belt – leading to greater in commuting or travel to Bristol and Cardiff.		
<p>Option 4: 7,950 new homes and 9,405 Jobs, Option 5: 8,100 new homes and 6,720 jobs & Option 6: 7,605 new homes and 5,835 jobs</p> <p>Given that Options 4, 5 and 6 and low growth options with broadly similar levels of new homes, we set out our combined comments on these options below in order to avoid duplication. It is noted in the first instance that these would be contrary to the Future Wales aspiration for Newport to achieve an increased strategic role.</p>			This assessment was produced for the purpose of the Growth and Spatial Options consultation, however the Integrated Sustainability Appraisal (ISA) assesses these in more detail.
Economy & Employment	We are of the view that these low growth options should all be categorised as red as they would not provide the combination of jobs and homes required to provide an increased strategic role for Newport		

Population & Communities	We are of the view that these low growth options should all be categorised as red as they would not provide the combination of jobs and homes required to provide an increased strategic role for Newport		
Health & Well Being	At the lower scales of growth these options are unlikely to provide the investment required in such facilities rather it would be a continuation of existing levels.		
Equality, Diversity and Inclusion	We support the overall conclusions of this assessment however, question whether this should be red given the importance of meeting needs.		
Transport & Movement	With each option there would be fewer opportunities for significant levels of investment in improved infrastructure or sustainable means of travel		
Natural Resources	It is clear that lower growth levels would require less greenfield land which would clearly result in a continuation of the existing urban / rural interface. However, there are areas that could benefit from new landscaping / planting to soften the interface and provide visual benefits in this regard.		
Biodiversity and Geodiversity	The categorisation seems in appropriate and it is unclear why options 5 and 6 are green yet brownfield sites have equal (if not greater) chance of disturbing habitats and actually being unable to adequately mitigate due to more limited land availability on site. They do not have the same level of opportunity to provide ecological enhancement and net gain as greenfield sites, this includes to SINCs and SACs.		
Historic Environment	We would note that each case would need to be dealt with based on its own merits, albeit there are more heritage assets (including Listed Buildings and Conservation Areas) within the urban area than there are in surrounding greenfield.		
Landscape	It is clear that lower growth levels would require less greenfield land which would clearly result in a continuation of the existing urban / rural interface. However, there are areas that could benefit from new landscaping / planting to soften the interface and provide visual benefits in this regard.		
Climate change	With regards to Flooding, there are considerable issues for existing properties in Newport, growth means higher investment and the potential to contribute towards solving existing problems There would potentially be less investment in sustainability. Lower growth is likely to contribute towards increased commuting whereby people would be priced out of the local market and "jump" the greenbelt to alternative locations where homes are available.		

Employment Land Options

EMPLOYMENT LAND OPTIONS:	
Recommendation One -	
4. Is this requirement appropriate for Newport?	
We are supportive of the recommendations of the Employment Land Review which seek to protect 157.8 ha of supply in order to achieve the 77ha requirement. We believe that this approach provides flexibility to achieve the Future Wales approach towards increasing the Strategic Role of Newport.	Noted
5. Should it be different and if so, why?	
As noted above, we support the recommendations of the Employment Land Review. Recommendation Two -	Noted
6. Should some sites be removed from the employment supply? Why?	
The Employment Land Review recommends that all the sites listed in Table E1 of the Executive Summary are retained within the RLDP, this includes both the Solutia Site and Queensway Meadows, therefore it is unclear why their removal is being considered, further clarity over this would be required in order for us to consider further. It is noted that if Newport is to achieve its increased Strategic Role, it is imperative that it is providing a balance of jobs and homes and a significant supply of deliverable land for both purposes is available.	Noted. The Employment Land Review (NB not executive summary) discusses this in more detail, including the recommendations regarding East of Queensway Meadows at section 8.8.
7. Should alternative land uses be considered for some sites? Please provide examples of such uses and your rationale for this.	
Given our response to question 6, we have no further comments on this question	Noted
Spatial Options	
SPATIAL OPTIONS:	
8. Which of these options do you feel is the most appropriate, and why?	
We consider that the urban expansion option provides the most appropriate solution, this is framed on our approach towards growth which is based on the higher growth option (1) being the only approach that would be in compliance with Future Wales (i.e. an increased strategic role for Newport). For this reason we believe that the previously developed land (PDL) approach and Village Focus approaches should both be ruled out at this stage.	Noted. The Spatial Option taken forward is discussed in detail in the Preferred Strategy Cabinet Paper, the Preferred Strategy Consultation Paper and associated Background Papers.
<u>Urban Expansion & Hybrid Options</u> We note that there are various overlaps between the Urban Expansion and Hybrid Options, and we consider them jointly in the below table given the similarities. Indeed, we believe that given the lack of large suitable previously developed sites that may be available as new allocations, the PDL element is likely to be comprised of those existing allocations that are proven to be deliverable and capable of being rolled over alongside a small scale windfall assumption. As such with both options the amount of greenfield expansion land is likely to be similar given the scale of growth required in order to meet the strategic role of the City. However, we note that in respect of villages, it is likely to only be appropriate to consider small scale development parcels to meet local needs, rather than any significant scale of expansion.	This assessment was produced for the purpose of the Growth and Spatial Options consultation, however the Integrated Sustainability Appraisal (ISA) assesses these in more detail.

Our comments in respect of the assessment of both is set out below.		
Economy & Employment	<p>Future Wales is clear that growth should be in and around Newport. As such, this approach would clearly be in line with the policy hierarchy. It is noted that over recent years there has been a concentration of development in the east of the City, there would be an opportunity with urban expansion to re focus on the west, north west and north of the City.</p> <p>We are strongly of the view that this should be green for both the Urban Expansion option and the Hybrid Option.</p>	
Population & Communities	We support the overall conclusions of this assessment with respect to Urban Expansion and believe that the same conclusions could be drawn from the Hybrid Option due to the fact that a similar quantum of greenfield development will be required in both scenario	
Health & Well Being	We support the overall conclusions of this assessment with respect to the Hybrid Option but believe that the same conclusions could be drawn from the Hybrid Option due to the fact that a similar quantum of greenfield development will be required in both scenario.	
Equality, Diversity and Inclusion	We support believe that for both Urban Expansion and Hybrid Options, the assessment should be green. Indeed, both will facilitate significant opportunities for improvements and this should not be down played	
Transport & Movement	Newport has been identified as a location for growth within Future Wales specifically because it is a sustainable location for growth. Its communities are well connected to public transport and well served by facilities. We note that it is indicated that more opportunities for investment could be apparent under high scenarios, we believe that the Council's assessment should be more positive on this indeed, higher levels of growth would enable a step change in investment and enhancement that could be a significant benefit. This should be re assessed as green. Indeed, this is far more likely to be the case than for small scale, incremental and piecemeal infill development and ad hoc brownfield sites.	
Natural Resources	We are surprised by the comments set out herein, it is noted that water consumption would increase for all options however, there are sustainable means of managing this. Much of the landscape surrounding Newport (where it is not at risk of flooding) is heavily influenced by negative urban impacts. New urban extensions can provide a means of	

	softening urban edges through more appropriate landscape buffers, open space and interface with rural areas. We also support the notion that greater investment brings the potential for more sustainable lifestyles, as greater facilities would exist and as construction techniques evolve and progress. We are strongly of the view that with appropriate planning interventions, this could be at least an orange category if not green.		
Biodiversity and Geodiversity	Again the categorisation seems inappropriate yet brownfield sites have equal (if not greater) chance of disturbing habitats and actually being unable to adequately mitigate. There is significant opportunity to provide ecological enhancement and net gain from greenfield sites, this includes to SINCs.		
Historic Environment	We would note that each case would need to be dealt with based on its own merits, albeit there are more heritage assets (including Listed Buildings and Conservation Areas) within the urban area than there are in surrounding green fields. Sites within our client's control would have no impacts on heritage assets.		
Landscape	As noted earlier much of the landscape surrounding Newport (where it is not at risk of flooding) is heavily influenced by negative urban impacts. New urban extensions can provide a means of softening urban edges through more appropriate landscape buffers, open space and interface with rural areas.		
Climate change	With regards to Flooding, there are considerable issues for existing properties in Newport, growth means higher investment and the potential to contribute towards solving existing problems. As such, sites such as our clients where flooding is not a constraint but are in sustainable locations form a solution to this and cannot be considered negative. Increased investment in local facilities would mean potentially increasing sustainability. Appropriate levels of growth being identified would prevent growth being dispersed across numerous local authorities which has happened over recent years due to supply constraints. Low growth means that people would "jump" the green belt leading to greater in commuting or travel to Bristol and Cardiff.		
10. Are there any other matters that should be given consideration when assessing these?			
In supporting our assessment of both the highest growth option and spatial approach which requires greenfield land, we set out below a number of key considerations in the benefits that they can bring. In			Noted

<p>particular in helping Newport to achieve and increased strategic role but also in terms of the other key assessment areas.</p>	
<p><u>Sustainable urban extensions</u> Our clients are of the view that it will be important to consider all scales of potential development from minor rounding off of settlements and infill to sustainable urban extensions in line with Future Wales. Indeed, the Welsh Government's guidance, "Building Better Places" actively seeks to achieve rounded communities based on the underlying principles of place making. The Town and Country Planning Association (TCPA) indicates that the full range of planning solutions should be available to communities in order to achieve "the most sustainable pattern of development locally". Guidance set out by the TCPA indicates that holistically planned urban extensions can enhance the natural environment and offer high-quality affordable housing and locally accessible work in beautiful, healthy and sociable communities. Such interventions could be exemplars in sustainability and energy efficiency. The TCPA also note that "Major planned developments such asurban extensions provide an opportunity to design-in the greenest of technologies and infrastructure from scratch, in ways that are not possible in smaller infill schemes". Such schemes can set a benchmark in quality and approach that can lead the way for smaller schemes elsewhere in the country. Appropriately sized and scaled urban extensions provide the opportunity for new development to positively address existing issues by creating a planned environment to suit and cater for a critical mass of population, services and facilities. These can: -include a variety of housing types, tenures and densities along with neighbourhood centres with mixed uses and a range of facilities; -provide a landscape structure that builds on existing assets, including green infrastructure within the development, linking urban areas to the countryside beyond and creating a distinctive edge to the urban area; -provide opportunities for people to work locally and for small businesses to set up, grow and thrive; -present an opportunity to design energy efficient communities; -allow pedestrian, cycle and public transport networks to be fully integrated, often improving services available to the adjacent communities, increasing health and well-being by reducing the reliance on cars; and -support the surrounding communities by offering facilities not available locally and by providing affordable housing for people in the care and support sectors they can ensure that the elderly can continue to live independently amongst friends and family reducing the costs of providing social and nursing care.</p>	<p>Noted. The Deposit Plan will include reviewed urban and village boundaries.</p>

<p>These concepts are best delivered through consideration of longer term time horizons and wider geographical areas so that the benefits of strategic solutions are explored. The alternative of short term, small scale, incremental and dispersed change will not yield the same overall benefits. Importantly, by applying a coherent and distinctive urban design concept and master planned approach that combines innovative solutions and reflection of local characteristics, such extensions can provide the opportunity to create a new development that has a strong local identity. This will facilitate effective integration with the existing community for whom there should be major benefits particularly in relation to supporting the existing economy and creating jobs but also in the provision of a range of housing sizes, styles and tenures to accommodate those currently priced out of the local housing market. This accords with a wide range of national planning policy requirements.</p>	
<p><u>Sustainable growth locations</u> It is inevitably the case that the supply of brownfield sites in Newport for redevelopment for residential purposes is limited. As such, the Council will need to consider sustainable and appropriate greenfield locations based around existing communities. In reality, this is likely to focus on the western and north western parts of the County extents associated with existing built form and communities. Indeed, we are of the view that the LDP must not neglect the requirements of these existing communities in favour of more remote areas on the Eastern side of the City that would be more aligned to commuting patterns along the M4.</p> <p>It is anticipated that such focal points for proportionate growth include a number of existing communities where there are a number of local facilities that can provide an opportunity to maximise levels of self-containment and sustainability. Indeed, proportionate growth can help to reinforce existing levels of sustainability but also seek to provide additional facilities and uses that can move to a greater level of neighbourhood and community well-being. In this regard, our clients consider that Bettws and Rogerstone are suitable locations to accommodate further sustainable growth.</p>	<p>Noted. The Deposit Plan will include reviewed urban and village boundaries.</p>
<p><u>Bettws</u> Bron Afon consider that the community will benefit from the significant investment and opportunities that an extension located at Bettws would bring. Indeed, Bettws is itself a sustainability community with a range of shops, schools and facilities and is very well served by public transport. However, it is in need of investment and opportunities in order to help reduce localised inequalities, there is a significant opportunity to increase the level of self-containment of Bettws through providing new homes and other land uses that could add to the level of local facilities.</p> <p>Bettws is very well served by regular bus routes, typically 20 minute frequency, to and from Newport running along Monnow Way. In addition, the canal towpath offers an easy and pleasant foot/cycle path route into the City centre approx. 4km distant.</p> <p>In the centre of Bettws there are a number of local shops, including Spar shop, post office, newsagent and hairdresser as well as several denominations of church, a library, a health centre, chemist, dental</p>	<p>The Deposit Plan will include reviewed urban and village boundaries.</p>

<p>surgery alongside Monnow Primary School and Newport High School. Bettws also has a number of sports grounds, playing fields and a leisure centre (active living centre associated with the High School). Bettws is visually very well contained both physically and visually. It is not widely visible and in the limited local views in which it features it is seen in the context of the built up area of Bettws. It is therefore considered that it should form an area of search for a suitable urban extension.</p>	
<p><u>Castleton</u> Castleton is a very sustainable local settlement located partway between the Cities of Newport and Cardiff. It provides a range of existing facilities and is considered to be highly appropriate for proportionate small scale extensions and infill development in order to help provide affordable homes. Indeed, there is considered to be a significant need for more affordable properties to help ensure a more balanced community. It is notable there is a wide range of local services and facilities that would ensure it is a suitable location for additional provision of homes: -Castleton and District Village Hall -Marshfield Primary School -Castleton Baptist Church Fellowship Petrol Station Convenience Store Motor Vehicle Garage Premier Inn Hotel Coach and Horses Restaurant and Pub Furthermore, it is located along sustainable public transport routes with bus stops run along Marshfield Road. These stops serve bus route 30, which operates between Cardiff and Newport via Old St Mellons, Castleton and Tredegar Park. This provides 28 services per day between Monday and Friday, 26 services on Saturdays and 10 services on Sundays. Summarily, it is clear that at the local scale a general level of self containment and walking can be achieved and more strategically it is well placed in respect of public transport routes. Small scale expansion with proportionate affordable homes that do not impact upon landscape constraints (in particular coalescence with Cardiff) should be explored and encouraged.</p>	<p>The Deposit Plan will include reviewed urban and village boundaries.</p>
<p><u>Bassaleg</u> Bassaleg is a very well established and popular area of Newport with a wide range of local facilities and services. It is considered an appropriate focal point in order to consider strategic growth to reinforce and strengthen levels of sustainability. Indeed in terms of existing facilities, alongside the education provision there is a convenience store, post office, allotments, public open space, children's play area and the village hall.</p>	<p>The Deposit Plan will include reviewed urban and village boundaries.</p>

<p>There are numerous bus services that operate along the A468 Caerphilly Road providing links to both local areas as well as an inter urban bus service providing access to Newport, Caerphilly, Ystrad Mynach, Cardiff and Bargoed.</p> <p>The train service from Pye Corner to Cardiff Ebbw Vale is 1.8km away. The station is located on the proposed integrated route network that runs along Park View and can connect to the existing active travel route. There is car parking at the station. It is considered an appropriate location for the provision of strategic growth that would compliment existing facilities provide more opportunities for local people to remain in the area.</p>	
<p><u>Rhiwderin</u></p> <p>Rhiwderin is a sustainable local community has a range of facilities including a community centre, a newsagent, post office, place of worship and a public house. In addition, it is within a reasonable walking and cycling distance to Pentrepoeth Primary School and Bassaleg Secondary School.</p> <p>In addition there are regular bus services close providing links to Newport City Centre as well as other inter urban bus services to surrounding towns including Caerphilly, Ystrad Mynach, Bargoed and Cardiff.</p>	<p>The Deposit Plan will include reviewed urban and village boundaries.</p>
<p><u>Rogerstone</u></p> <p>Bron Afon consider that sites within easy walking distance of Rogerstone Railway Station which is one of the few South Wales Metro -rail connections within Newport's administrative area - should act as a focal point around which new development should be encouraged. Indeed, this links to Cardiff, Ebbw Vale, and beyond (to Swansea, Bristol, London and the Midlands). Furthermore, regular bus services run along Risca Road providing links between Newport and Risca/Pontymister as well as between Newport and Blackwood.</p> <p>There exists a wide range of facilities locally including supermarkets at Afon Village and Pontymister/Risca, a post office, various shops, restaurants, places of worship and employment areas such as the Wern, Tregwilym and Pontymister industrial / trading estates as well as Cleppa Business Park. Rogerstone Primary School, Jubilee Park and Mount Pleasant Primary Schools and Bassaleg Secondary School;</p> <p>It is considered an appropriate location for the provision of proportionate growth that would compliment existing facilities provide more opportunities for local people to remain in the area.</p>	<p>The Deposit Plan will include reviewed urban and village boundaries.</p>
<p>Evidence Base</p> <p>EVIDENCE BASE:</p> <p>11. Are there any other pieces of evidence that you believe should inform the development of the preferred growth and spatial options strategies?</p>	
<p>It is noted that only limited evidence is currently available and it is clear that there will be a need to publish significantly more evidence in respect of matters such as supply of housing land. It is noted that</p>	<p>Noted</p>
<p>12. Are there any other comments you'd like to make regarding anything within this consultation document? Do you agree with the Objectives for the RLDP? If not, how and why do you think they should be changed?</p>	

<p>We have commented previously on the Objectives of the RLDP and reserve the right to comment further once the updated Objectives are consulted upon.</p> <p>For ease of reference, it is noted that in general terms we are supportive of the overall approach towards the objectives, however, we believe that particular attention is needed with regards to economic and population / community objectives. As we have stated earlier, there are significant challenges ahead and it must be the role of the planning process to help address these issues rather than constrain recovery and realignment.</p> <p>We are strongly of the view that well planned urban extensions can contribute towards a range of the key objectives not just in respect of population and communities, inclusive of:</p> <ul style="list-style-type: none"> -including a variety of housing types, tenures and densities along with neighbourhood centres with mixed uses and a range of facilities; -providing a landscape structure that builds on existing assets, including green infrastructure within the development, linking urban areas to the countryside beyond and creating a distinctive edge to the urban area; -providing opportunities for people to work locally and for small businesses to set up, grow and thrive; -presenting an opportunity to design energy efficient communities; <p>Allowing pedestrian, cycle and public transport networks to be fully integrated, often improving services available to the adjacent communities, increasing health and well-being by reducing the reliance on cars;</p> <p>and</p> <p>Supporting the surrounding communities by offering facilities not available locally and by providing affordable housing for people in the care and support sectors they can ensure that the elderly can continue to live independently amongst friends and family reducing the costs of providing social and nursing care</p>	<p>Noted. The Deposit Plan will include reviewed urban and village boundaries.</p>
<p>Other comments</p>	
<p>It is noted that our client is currently in the process of liaising with house builders and housing associations in respect of refining development proposals for their sites. However, they would welcome engagement with the Council on whether they consider either site could play a role in the delivery of sustainable communities through the replacement LDP.</p>	<p>Noted</p>

GSO 032 - RPS Consulting Services Ltd - 00853

Question / Response	Officer Response
<p>GROWTH OPTIONS: Growth Scenarios - 1. Are there any scenarios that have been discounted which should be considered further, and why? 2. Which of the options do you feel is the most appropriate, and why?</p>	

Assessment of Growth Options Against RLDP Objectives - 3. Are there any other matters that should be taken account of when assessing these scenarios and identifying a Preferred Strategy?	
<p>1. There are no scenarios that have been discounted that should be considered further.</p> <p>2. The higher housing growth scenarios published in the growth and spatial options paper accurately reflect that the RLDP has to conform with the Future Wales' spatial strategy. The RLDP should recognise the National Growth Area as the focus for strategic economic and housing growth; essential services and facilities; advanced manufacturing; transport and digital infrastructure. Option 1 (Dwelling-led SYR) is the most appropriate of the growth scenarios to fulfil Future Wales. The Welsh Government is determined to see development and growth in Newport, allowing the city to fulfil its potential as a second focal point for the region. Highly skilled employment opportunities in the transport and digital communications sectors should be catalysts for further economic investments. Option 1 proposes the highest amount of dwellings across the local authority. This is essential to enhance Newport's economic role. The Dwelling-led 5YR scenario has a higher but realistic population change than Option 2 WG-2018-HIGHPOP. This is the step change necessary to achieve the National Plan. Option 1 is the only option with housing supply above the current LDP strategy, therefore, reflecting Newport's focus for growth role established by the Future Wales National Plan 2040.</p> <p>3. Option 1 will overall bring a neutral contribution to the RLDP objectives; population and communities, health and wellbeing, equality, diversion and inclusion and transport and movement. The risk of not achieving a step change for the City and delivery of growth as envisaged in Future Wales should be a matter for consideration when assessing the scenarios. To de- risk the plan the Preferred Strategy should be based upon a robust assessment of the capacity to deliver Option 1. Delivery and viability should be embedded in the next stages of the candidate site process. An adequate flexibility allowance should be applied to de- risk the plan.</p> <p>The preferred strategy should be based on an objective assessment of the role and function of places within Newport in line with the search sequence and National Sustainable Placemaking Outcomes, as set out in PPW. This will create inclusive, connected, adaptable and accessible communities that are cohesive and ensure Newport's potential is realised.</p>	<p>Noted. The Growth Option taken forward is discussed in detail in the Preferred Strategy Cabinet Paper, the Preferred Strategy Consultation Paper and associated Background Papers.</p>
EMPLOYMENT LAND OPTIONS: Recommendation One - 4. Is this requirement appropriate for Newport? 5. Should it be different and if so, why? Recommendation Two - 6. Should some sites be removed from the employment supply? Why? 7. Should alternative land uses be considered for some sites? Please provide examples of such uses and your rationale for this	

<p>4. Recommendation 1 is the minimum requirement to fulfil the expectations of Future Wales for Newport to be the focus for strategic economic growth; essential services and facilities; advanced manufacturing; transport and digital infrastructure.</p> <p>5. Yes, it should probably be different. If the supply to match the requirement is to include the sites identified in the ELR the requirement should be higher.</p> <p>Excluding land East of the Queensway the supply amounts to just over 90 hectares. However, just over 40 hectares is ring fenced for the expansion of Eastman (Solutia). It cannot be considered as readily available to meet the broader employment land requirement to fulfil the growth strategy.</p> <p>Furthermore, the ELR assesses the Accessibility, Environmental Factors and Market Attractiveness of nine sites (includes East of Queensway). Three sites are considered to score highly, amounting to just under 48 hectares.</p> <p>The requirement should be for 77 hectares of readily available, accessible, and attractive employment land. Given a site is ring fenced for Eastman (Solutia) the requirement should be for 117 hectares.</p> <p>6. Given the need to fulfil the local and sub regional (CCR) employment sites, other than land East of Queensway, should not be removed from the employment land supply.</p> <p>7. TAN 23: Economic Development and PPW state that an existing employment site should only be released for other uses if other priorities, such as housing need overrides more narrowly focused economic considerations. The economic considerations are of national significance as per the growth strategy (Future Wales).</p>	<p>Noted. The Growth Option taken forward is discussed in detail in the Preferred Strategy Cabinet Paper, the Preferred Strategy Consultation Paper and associated Background Papers.</p>
<p>Spatial Options</p> <p>8. Which of these options do you feel is the most appropriate, and why?</p> <p>9. Are there any other spatial distributions that should be considered, and if so, why?</p> <p>10. Are there any other matters that should be given consideration when assessing these?</p>	
<p>8. With regard to spatial options, a hybrid approach is favoured with a mixture of previously developed land, sites on the edge of the urban boundary and sites at surrounding existing villages. Where there is a need for sites and there is no previously developed land or underutilised sites, consideration can be given to suitable and sustainable greenfield sites within or on the edge of settlements. A balance of previously developed land, sites on the edge of the urban boundary and sites at surrounding existing villages will ensure a range of locations and size of sites. A range of sites de risks the delivery of the RLDP.</p> <p>The hybrid approach scores highly against the RLDP objectives for Economy and Employment, health and wellbeing and biodiversity and geodiversity. Under the hybrid approach or urban expansion option, land at Glochwen, Rhiwderin is immediately adjacent to the existing urban area. Taking into account designations and the characteristics of the site some 160 dwellings could be accommodated. The currently freight only railway line runs through Rhiwderin.</p>	<p>Noted. The Spatial Option taken forward is discussed in detail in the Preferred Strategy Cabinet Paper, the Preferred Strategy Consultation Paper and associated background papers.</p> <p>The Deposit Plan will include a review of the urban and village boundaries. The Settlement Assessment Background Paper provides a village appraisal.</p>

<p>Rhiwderin is well established location within the existing urban area. There is access to existing services and facilities within the area including schools, convenience retail, community buildings, active travel routes, bus and train services both providing direct links to the city centre. Development at West Newport is well placed to support the ongoing regeneration of the city centre.</p> <p>PPW is clear due to their strategic nature Green Belts will have significance beyond a single local authority and they should only be proposed as part of either a Joint LDP, an SDP or Future Wales. The green belt needs to be balanced with placemaking potential and achieving the growth strategy as per Future Wales. The national plan envisages strategic growth should be focused in and immediately adjoining Newport itself.</p> <p>9. The four spatial distributions provided cover the full range of options from urban to rural land use for development, with the addition of a mixture of both.</p> <p>10. The hybrid option scores favourably as per the assessment of spatial options. To de risk the delivery of the plan as per the LDP Manual 3 a further matter for consideration is the delivery risk associated with each of the spatial options. The hybrid option is low risk. Furthermore, development at West Newport has excellent linkages to the city centre and employment at Celtic Springs, Cleppa Park and Imperial Park. The site at Glochwen, Rhiwderin could possibly include a direct active travel route to Jubilee Park residential estate and school as well as further to Pye Corner</p>	
<p>Evidence Base</p>	
<p>1. Are there any other pieces of evidence that you believe should inform the development of the preferred growth and spatial options strategies?</p> <p>2. Are there any other comments you'd like to make regarding anything within this consultation document? Do you agree with the Objectives for the RLDP? If not, how and why do you think they should be changed?</p>	
<p>11. The current evidence base used to inform the development of the preferred growth and spatial options strategies is sufficient and critically incapsulates Newport as a growth in National planning policy.</p> <p>12. It is important that the RLDP takes a pragmatic approach and provides a good balance between housing and employment growth opportunity. There needs to be a strong focus on those identified areas for growth in the paper. A good range of different house types and tenures in a range of locations should be supported through the RLDP, taking advantage of available land on the edge of Newport to help to deliver an appropriate scale of growth for the City.</p>	<p>Noted</p>
<p>Other Comments</p>	
<p>Whilst historically Rhiwderin is classed as a village, it has evidently accommodated urban extension growth. The location benefits from the services and facilities provided in the Bassaleg/Rhiwderin area</p>	<p>The Deposit Plan will include a review of the urban and village boundaries.</p>

GSO 033 - Beechurst Homes Ltd - 00646

<p>Growth Options Growth Scenarios –</p>
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1. Are there any scenarios that have been discounted which should be considered further, and why?

2. Which of the options do you feel is the most appropriate, and why?

Assessment of Growth Options Against RLDP Objectives –

3. Are there any other matters that should be taken account of when assessing these scenarios and identifying a Preferred Strategy?

Background

Chapter 3 of the Growth and Spatial Options paper presents and seeks feedback on a series of growth scenarios which would, in turn, inform the housing requirement and the number of jobs to be planned for (which would inform the employment land requirement) in the Replacement Local Development Plan ("RLDP") with a plan period of 2021-2036. Initially, 12 scenarios are presented in Table 1 (page 12) with Table 2 (page 13) refining this down to six Growth Options as the employment-led scenarios. The scenarios that would result in low levels of growth have been removed as they do not align to Future Wales - The National Plan 2040 (February 2021) vision for Newport as a National Growth Area. For context, and as you will be aware, Beechurst Homes Limited submitted representations in support of the Land to the North of Christchurch Hill, Christchurch in August 2021. Given Beechurst Homes Limited's land interests within Newport, the Growth and Spatial Options paper is only relevant in so much as it informs the housing requirement. As a result, matters relating to the number of jobs to be planned (and the associated employment land requirement) are not relevant.

Context

Planning Policy Wales (Edition 11, February 2021) is clear as to how a housing requirement should be formulated. Paragraph 4.2.6 states: "The latest Welsh Government local authority level Household Projections for Wales, alongside the latest Local Housing Market Assessment (LHMA) and the Well-being plan for a plan area, will form a fundamental part of the evidence base for development plans. These should be considered together with other key evidence in relation to issues such as what the plan is seeking to achieve, links between homes and jobs, the need for affordable housing, Welsh language considerations and the deliverability of the plan, in order to identify an appropriate strategy for the delivery of housing in the plan area. Appropriate consideration must also be given to the wider social, economic, environmental and cultural factors in a plan area in order to ensure the creation of sustainable places and cohesive communities."

From the above it is clear that:

1. Household projections should be used as the starting point for establishing the housing requirement;
2. But that other elements of the evidence base should also underpin the housing requirement; and
3. The wider political, economic, social and environmental context, combined with what the Local Planning Authority (LPA) want the Replacement Local Development Plan (RLDP) to achieve, should be considered.

These matters are discussed in turn below.

Noted. Candidate Site assessments are being carried out as part of a separate process. The results of the Stage 1 assessment can be found in the Candidate Site's Register. Stage 2 of the assessment will be published as part of the Preferred Strategy consultation.

<p><u>1. Household projections</u></p> <p>Beechurst Homes Limited suggest that the correct projection to use is the WG-2019-HIGHPOP (Growth Option 2 from Table 2 (page 13)). The reason for this suggestion is that, unlike the WG-2018-Principal or the WG-2018-LOWPOP projections, it is re-based to the 2021 census. This is the right starting point because it utilises the most recent set of household projections (2018 based) whilst responding to the actual findings of the 2021 census which provide a more recent, and therefore reliable, snapshot in time than the 2018-based projections. In other words, these projections reflect the actual 'position on the ground', and the projections associated with it, at a fixed point in time rather than a wholly projected scenario.</p> <p>This is particularly important in the case of Newport City Council (NCC) where there is a significant under estimation of the position compared to the actual findings of the 2021 census. This is articulated in the 'LDP Demographics' Paper prepared by Edge Analytics on behalf of NCC. Paragraph 2.25 states: "Newport has seen the largest population increase between the 2020 MYE and 2021 census population compared to other Welsh authorities (2.0%) (Figure 20). Only two out of the 22 Welsh authorities have seen an increase between the two population figures (Powys and Newport), with the rest of the authorities showing population declines".</p> <p>Taking the above together, it is particularly important for an LPA such as NCC where there is a significant diversion between the 2018-based projections and the 2021 census to use the WG-2018-HIGHPOP.</p>	<p>Noted. The Growth Option taken forward is discussed in detail in the Preferred Strategy Cabinet Paper, the Preferred Strategy Consultation Paper and associated Background Papers.</p>
<p><u>Evidence base</u></p> <p>Two of the options presented in Table 1 of the Growth and Spatial Options paper are the PG-Short Term and PG-Long Term scenarios (the PG-Long Term is also presented as Option 5 in Table 2). These scenarios use the ONS 2020 Mid-Year Estimate and then calibrate either to assume migration rates over the last five years (in the case of the PG-Short Term) or 19 years (PG- Long Term). The below table has been put together using the ONS 'Local Area Migration Indicators' dataset from September 2021 and shows the net balance of inflow and outflow over the last ten years to and from Newport from other parts of the UK. In this case, it is calculated by subtracting the number of people that leave NCC to move to another local authority from the number of people that move to NCC from another local authority:</p> <p>Year Net Internal Inflow</p> <p>2010-2011 90</p> <p>2011-2012 -197</p> <p>2012-2013 -357</p> <p>2013-2014 -485</p> <p>2014-2015 -11</p> <p>2015-2016 271</p> <p>2016-2017 1,098</p> <p>2017-2018 1,211</p>	<p>Noted. The Growth Option taken forward is discussed in detail in the Preferred Strategy Cabinet Paper, the Preferred Strategy Consultation Paper and associated Background Papers. To be passed to Edge for further consideration.</p>

<p>2018-2019 445 2019-2020 1,118</p> <p>The table shows a changing balance over the last 10 years, from a period where there was a net outflow of people from Newport to a situation since 2015-2016 where there has been a sustained and significant net inflow of people from Newport. Assuming a household size of 2.3 people, the net inflow would represent an additional 486 homes per annum for 2019/2020. The 2018/2019 figure is an anomaly as a result of COVID-19 - something that is recognised in Paragraph 2.15 of the 'LDP Demographics Paper'. The 'LDP Demographics' Paper prepared by Edge Analytics explains why it is the case that there has been a net inflow since 2015/2016 at paragraph 2.14 which states: "Likely factors driving this increase include the rate at which new homes have been built, the removal of the Severn Bridge toll in 2018 and the introduction of ONS' Higher Education Leavers Methodology (HELM)."</p> <p>The fact that the greatest inflow is from Bristol, North Somerset and South Gloucestershire (Figures 14 and 15 of the LDP Demographics Paper) helps to confirm this conclusion. The position with regards to the Severn Bridge tolls is fixed - the tolls have been removed and there is no indication of them being re-introduced. There is, therefore, no structural reason as to why the net inflow of people would reverse in coming years.</p> <p>Reechurst Homes Limited do not suggest it would be the right approach for either of the PG to be chosen as growth option as ultimately they look at previous trends rather than future projections to come over the RLDP plan period, but it is clear that the level of UK based migration is such that a significant uplift on the selected demographic scenario should be applied and that this should be based on a PG option that considers the level of net internal migration over the last four years since the tolls have been removed (excluding the year affected by the COVID-19 pandemic) rather than a longer time window such is the material difference caused by the Severn Bridge tolls being removed. This should be applied as a "multiplier" on top of Growth Option 2.</p>	
<p>3. <u>Wider political, economic, social and environmental context</u></p> <p>The Growth and Spatial Options paper sets out how Newport should be seen in the context of the wider South East Wales region in Future Wales - The National Plan 2040 (February 2021). The development plan status of Future Wales and what it means for Newport is discussed in Section 2.1 of the Growth and Spatial Options paper. While repeating information contained in the document is unnecessary, it is evident from Policy 33 (National Growth Areas - Cardiff, Newport and the Valleys) that Newport should:</p> <ul style="list-style-type: none"> • Have an increased strategic role for sustainable long-term growth; • Be a growth pole for new housing in the eastern part of South Wales; and ; • Work alongside neighbouring authorities (both in South Wales and England) to achieve this. <p>The implications of this are that any Growth Option selected must be aspirational. This is recognised in Section 3.1 of the Growth and Spatial Options document which, on page 12, explains that a number of</p>	<p>Noted. The Growth Option taken forward is discussed in detail in the Preferred Strategy Cabinet Paper, the Preferred Strategy Consultation Paper and associated Background Papers.</p>

<p>the options suggested in Table 1 have been dismissed due to their low scale of growth not being in conformity with Future Wales.</p> <p>The status of Newport in Future Wales provides further justification for WG-2018-HIGHPOP (Growth Option 2) as a starting point given that it is aspirational in nature whilst the encouragement to work with neighbouring local authorities suggests that net inflow into Newport from neighbouring authorities should be welcomed and planned for through the incorporation of a PG scenario.</p>	
<p><u>Assessment of Growth Options against RLDP objectives</u></p> <p>Appendix A of the Growth and Spatial Options paper provides an appraisal of the performance of the six Growth Options against the 10 RLDP Objectives, in essence creating a matrix that allows for comparison between the various options. This is built upon further in Appendix A of the document.</p> <p>Beechurst Homes Limited's concern is that the assessment undertaken as part of Table 3 and in Appendix A assumes that a certain Growth Option will have an 'Amber' or even 'Red' impact when the selection of appropriate sites which are environmentally and technically acceptable (or incorporate appropriate mitigation, compensation and enhancement to achieve this) can mean that they can be delivered without a negative impact (i.e. with a 'Green' or, at worst, 'Amber' impact).</p> <p>In this sense, it is essential to stress that the submission made by Beechurst Homes Limited (relating to land to the North of Christchurch Hill, Christchurch) as part of the Call for Candidate sites represents an opportunity which could be delivered in a way which is technically and environmentally sound. For context, please note that Beechurst Homes Limited is in process of strengthening the initial submission through the instruction of ecological surveys, transport surveys, updated masterplanning outputs and viability reporting) to further confirm this and seeks to submit this additional information at Preferred Strategy stage. At present, the preliminary results of the surveys in process of being undertaken suggest that the site's performance against the aforementioned objectives will likely be considered as 'Green'.</p>	<p>Noted. This assessment was produced for the purpose of the Growth and Spatial Options consultation, however the Integrated Sustainability Appraisal (ISA) assesses these in more detail.</p> <p>Candidate Site assessments are being carried out as part of a separate process. The results of the Stage 1 assessment can be found in the Candidate Site's Register. Stage 2 of the assessment will be published as part of the Preferred Strategy consultation.</p>
<p><u>Extent of flexibility allowance</u></p> <p>Paragraph 5.58 of the Development Plans Manual (Edition 3, March 2020) is clear that there is a requirement for a flexibility allowance to be added on top of the housing requirement to derive the number of homes that the RLDP should plan for over a plan period. This is in the interest of ensuring that sufficient housing is delivered when some allocated sites either are not delivered or deliver less homes than anticipated. Paragraph 5.59 adds that the extent of the flexibility allowance should be informed by local issues with 10% being a starting point (i.e. as the minimum).</p>	<p>Noted, the Preferred Strategy Cabinet Paper, the Preferred Strategy Consultation Paper and associated background papers provide greater detail on this.</p>
<p>Beechurst Homes Limited recognise that the extent of the flexibility allowance will be determined considerably later in the RLDP preparation stage, likely at Deposit stage and that it is, therefore, premature to comment too much on it at this time. Notwithstanding this, Indicator OB4 MT3 of the Annual Monitoring Report (October 2022) for the period from April 2021 to April 2022 recognised a cumulative shortfall in housing delivery against the LDP's housing trajectory. Historic performance against this indicator is presented in the table below.</p>	

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<p>Year % Delivery against cumulative required rates</p> <p>2015 -5%</p> <p>2016 3%</p> <p>2017 -2%</p> <p>2018 -6%</p> <p>2019 -9%</p> <p>2020 -12%</p> <p>2021 -14%</p>	
<p>Importantly, this is against the housing requirement of 10,350 homes and not the 11,623 homes that the adopted Local Development Plan (January 2015) plans for. In essence, in 2021 where the rate is a -14% rate, this is 14% below the housing requirement but 26% below the number of homes that were planned for which incorporated the 12% buffer in the adopted LDP. Even at this stage, it is clear from the above that the 12% buffer in the adopted LDP is entirely inadequate and a greater buffer should be incorporated for the RLDP.</p>	
<p>Employment Land options</p> <p>Recommendation One –</p> <p><input checked="" type="checkbox"/> Is this requirement appropriate for Newport?</p> <p><input checked="" type="checkbox"/> Should it be different and if so, why?</p> <p>Recommendation Two –</p> <p><input checked="" type="checkbox"/> Should some sites be removed from the employment supply? Why?</p> <p><input checked="" type="checkbox"/> Should alternative land uses be considered for some sites? Please provide examples of such uses and your rationale for this.</p>	
<p>Beechurst Homes Limited has no comments to make on this matter at this point in time but reserves its position to do so in future stages.</p>	<p>Noted</p>
<p>Spatial Options</p> <p>8. Which of these options do you feel is the most appropriate, and why?</p> <p>9. Are there any other spatial distributions that should be considered, and if so, why?</p> <p>10. Are there any other matters that should be given consideration when assessing these?</p>	
<p><u>Background</u></p> <p>Chapter 4 of the Growth and Spatial Options paper presents four Spatial Options as to how the requirements outlined in Chapters 2 and 3 should be distributed spatially. Four options are presented:</p> <ul style="list-style-type: none"> -PDL-led - focus new development on previously developed (brownfield) land; -Urban Expansion - focus on a series of greenfield allocations on the edge of the urban boundary; -Village Focus - directing growth to nine identified villages; and -Hybrid - a hybrid of the previous three options. <p>Paragraph 3.44 of Planning Policy Wales (Edition 11, February 2021) provides guidance as to how the site search sequence should be undertaken when identifying residential allocations, stating that:</p>	<p>Noted</p>

"Where there is a need for sites, but it has been clearly demonstrated that there is no previously developed land or underutilised sites (within the authority or neighbouring authorities), consideration should then be given to suitable and sustainable greenfield sites within or on the edge of settlements. The identification of sites in the open countryside, including new settlements, must only be considered in exceptional circumstances and subject to the considerations above and paragraph 3.50 below." This rhetoric places PDL as the priority but allows development on sustainable greenfield sites.

Commentary on reliance on PDL-led approach

Whilst national planning policy states the delivery of PDL is a priority, the Growth and Spatial Options paper recognises that there is insufficient PDL available for the continuation of the PDL-led approach taken in the adopted LDP (and the Unitary development Plan prior). The first paragraph of Section 5 is clear on this, stating: "While the merits of continuing this strategy are understood, there is some concern that previously developed land is a finite resource and the availability of sites may not be as buoyant as it was or the reuse of land for housing may require the de-allocation of some employment sites."

On this basis, it is evident that the PDL-led Spatial Option is not going to be sufficient to meet the higher Growth Options discussed in earlier comments of this form and supported by Newport's role in a National Growth Area of Future Wales. There is also a wider point to consider - this relates to whether reliance on a PDL-led strategy is sufficiently robust to ensure that the housing requirement is delivered in full. The adopted LDP relies on a PDL-led strategy and, as discussed in earlier comments of this form, this has resulted in a significant shortfall of housing delivery compared to the housing trajectory.

Analysis from the Annual Monitoring Report (October 2022) for the period from April 2021 to April 2022 shows that there are 1,189 (equating to 11.5% of the total housing requirement) units that the adopted LDP anticipated to be delivered on brownfield sites in the adopted LDP plan period but now are not expected to be delivered prior to its end date in 2026.

From the above, it is clear that there is not enough PDL land for the implementation of a PDL-led Spatial Strategy and that, even if there was, the implementation of a PDL-led approach would likely result in a shortfall in delivery against requirement.

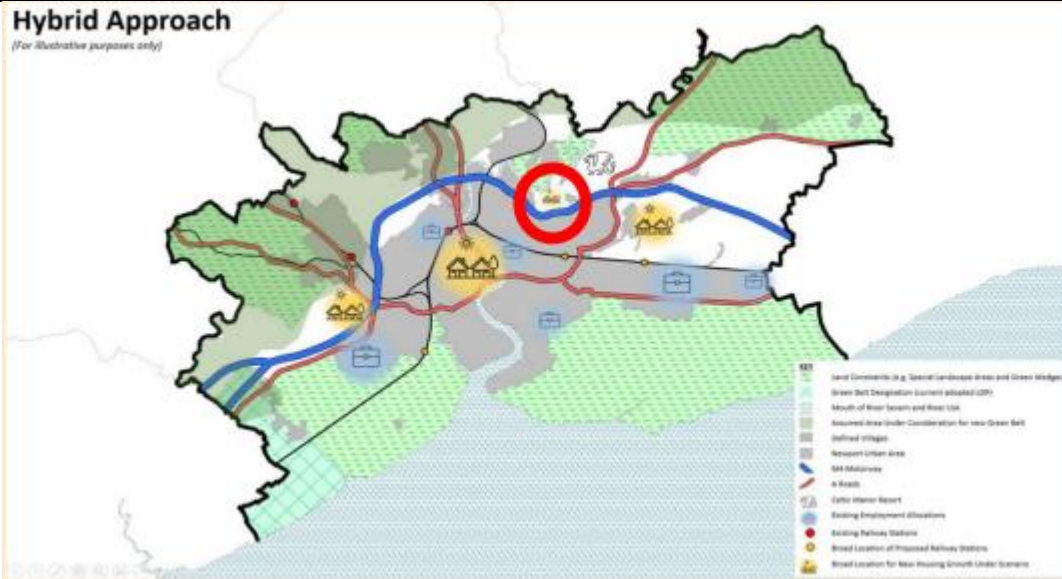
Beechurst Homes Limited therefore suggest that:

- Any PDL allocations in the adopted LDP where development has not commenced should continue to be supported through a positive allocation but should not be relied upon to meet the housing requirement;
- No PDL allocations should be made on sites with capacity for less than 50 homes (as many of the smaller allocations in the current LDP have not delivered). Sites of less than 50 should be allowed to come forward as windfall sites; and
- New PDL allocations in excess of 50 homes that are counted towards meeting the housing requirement should only be made where it has been demonstrated that these are viable (as now required by Development Plan Manual (Edition 3, March 2020) in any event).

<p><u>Suggested approach</u></p> <p>As outlined in the Growth and Spatial Options paper, Beechurst Homes Limited recognises that the Village Focus option would "direct housing development towards the nine defined villages of Castleton and Marshfield; St Brides; Bishton; Llanwern; Underwood; Llanvaches; Parc Seymour; Christchurch and Caerleon".</p> <p>As part of this, the document recognises that "some villages are more constrained than others and as a result less constrained villages would support a high proportion of growth under this scenario".</p> <p>Beechurst Homes Limited wishes to emphasise the suitability of the village of Christchurch (and specifically land to the North of Christchurch Hill, Christchurch) for residential development - this is highlighted in further detail below. However, Beechurst Homes Limited are also cognisant of the fact that directing all growth to villages only is not necessarily sustainable - this is confirmed in the Growth and Spatial Options paper which notes that "directing development towards villages alone is likely to result in a high amount of greenfield land consumption and is unlikely to support a higher scale of growth due to land availability and the level of existing services and facilities".</p> <p>In light of the above, it is evident that the Higher Growth Options set out in the Growth and Spatial Options paper (including the modified Option 2 that Beechurst Homes Limited support) are unlikely to be able to be met in their entirety through either the 'Village Focus' Spatial Option or the 'Urban Extension' option and, therefore, it is suggested that the 'Hybrid Approach' Spatial Option represents the only suitable Spatial Option that can deliver the Higher Growth Options that are suggested and continue to perform strongly against the RLDP objectives. As part of this, it is essential that the 'Hybrid Approach' Spatial Option directs new housing to the most appropriate locations, which, as set out below, should include the village of Christchurch.</p>	<p>Noted. The Spatial Option taken forward is discussed in detail in the Preferred Strategy Cabinet Paper, the Preferred Strategy Consultation Paper and associated Background Papers.</p> <p>Candidate Site assessments are being carried out as part of a separate process. The results of the Stage 1 assessment can be found in the Candidate Site's Register. Stage 2 of the assessment will be published as part of the Preferred Strategy consultation.</p>
<p><u>Christchurch</u></p> <p>As part of the 'Hybrid Approach' Spatial Option, which is supported by Beechurst Homes Limited, it is understood that a proportion of housing would be directed to sites surrounding existing villages. In this way, it is positive to see that both diagrams for the 'Village Focus' approach and the 'Hybrid Approach' specifically identifies Christchurch (as circled in red below) as a 'Broad Location for New Housing Growth Under Scenario'.</p>	<p>Noted. The Deposit Plan will include reviewed urban and village boundaries and green wedge designations.</p>

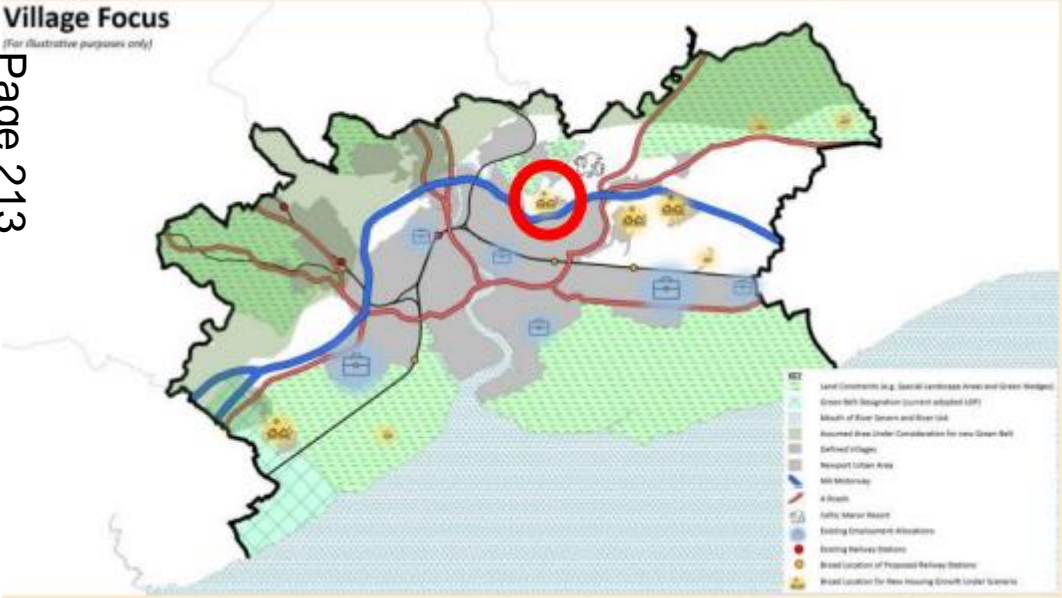
Hybrid Approach

(For illustrative purposes only)



Village Focus

(For illustrative purposes only)



<p>It is recognised that the above diagrams are illustrative in nature and do not seek to identify specific sites. Notwithstanding this, Beechurst Homes Limited support the identification of Christchurch as an appropriate location for new residential development. The fact that the village of Christchurch has been identified as suitable under not only under the 'Village Focus' spatial option but also the 'Hybrid Approach' spatial option (where other villages are not shown) further demonstrates the inherent suitability of Christchurch as a sustainable location for housing growth. In this way, the village of Christchurch represents a wholly appropriate opportunity to meet housing demand as a component of the 'Hybrid Approach'.</p> <p>Christchurch is considered to be one of the top performing of the nine defined villages in terms of suitability and sustainability. Christchurch, and specifically land to the North of Christchurch Hill, Christchurch, is considered a highly suitable location for new housing as part of a 'Hybrid Approach' Spatial Option for the following reasons:</p> <ul style="list-style-type: none"> • It is largely free from fundamental constraints in that its elevated position means it is not at flood risk, is outside of the 'Assumed Area Under Consideration for New Green Belt' and, is not washed over by (and is outside of) significant landscape, ecological and heritage designations; • Christchurch is a sustainable location well-connected to existing local bus and active travel routes and contains a range of local services (public house, village hall, church etc.); and • It would add to the range and choice of housing supply locally in a context where the adopted LDP did not make new housing allocations within Christchurch (instead only creating a positive planning context for a series of existing housing commitments which have now been fully delivered). <p>Whilst it is recognised that this consultation is not focussed on assessing individual sites such that they can be allocated, Beechurst Homes Limited would emphasise the fundamental suitability of Land to the North of Christchurch Hill, Christchurch to accommodate new housing.</p>	
<p><u>Next Steps & Update</u></p> <p>As previously outlined, Beechurst Homes Limited has instructed additional information - which is currently being prepared - to support the Candidate Site exercise at Preferred Strategy stage that will further demonstrate the technical acceptability, suitability and deliverability of Land to the North of Christchurch Hill, Christchurch. This information includes:</p> <ul style="list-style-type: none"> • Tree Survey; • Transport Technical Note; • Masterplan; • Preliminary Ecological Appraisal; • Landscape and Visual Statement; and • Viability Note. 	<p>Candidate Site assessments are being carried out as part of a separate process. The results of the Stage 1 assessment can be found in the Candidate Site's Register. Stage 2 of the assessment will be published as part of the Preferred Strategy consultation.</p>

<p>At this point, Beechurst Homes Limited wishes to confirm that the additional information has been instructed - the preliminary findings of which conclude the site is suitable for residential development - will be formally submitted to NCC at Preferred Strategy stage which is anticipated in autumn 2023. Communication with NCC indicates that at Preferred Strategy stage the Council will be re-opening the Call for Candidate Sites as they are obliged to consider new sites and as such will accept supplementary provisions on formally submitted Candidate Sites (as is the case here).</p>	
<p>EVIDENCE BASE: 11. Are there any other pieces of evidence that you believe should inform the development of the preferred growth and spatial options strategies? 12. Are there any other comments you'd like to make regarding anything within this consultation document? Do you agree with the Objectives for the RLDP? If not, how and why do you think they should be changed?</p>	
<p>Beechurst Homes Limited has no comments to make on this matter at this point in time but reserves its position to do so in future stages.</p>	<p>Noted</p>
<p>Other Comments</p>	
<p>Beechurst Homes Limited has no comments to make on this matter at this point in time but reserves its position to do so in future stages.</p>	<p>Noted</p>

GSO 034 - Wentlooge Community Council - 00028

Question / Response	Officer Response
<p>Peterstone and St.Brides are villages in the Gwent Levels. The Levels are an ancient landscape with a special cultural significance. This area is also important for biodiversity, recreation, flood alleviation, carbon storage and food production.</p> <p>We take the protection of our environment and historical structure of the Levels very seriously. The Minister has also laid a great deal of emphasis on the character and historical appearance of the Wentlooge Levels specifically in a statement released by the Welsh Government and in decisions on PNS planning applications in this area.</p> <p>The area of the Wentlooge Levels is open countryside, a designated Site of Special Scientific Interest (SSSI), a CADW/ICOMOS UK Registered Landscape of Outstanding Historic Interest, an Archaeologically Sensitive Area, adjacent to the new Wales Coastal Path and to the internationally important RAMSAR site of the Severn Estuary.</p> <p>The Levels are a Special Landscape Area (SLA) recognised nationally and internationally (NCC,LDP Policies SP5 and 8).</p> <p>Planning Policy Wales (PPW) 10 sets out that "planning authorities must seek to maintain and enhance biodiversity in the exercise of their functions. This means that development should not cause any significant loss of habitats or populations of species, locally or nationally and must provide a net benefit</p>	<p>The Deposit Plan will include a review of the urban and village boundaries. The Settlement Assessment Background Paper provides a village appraisal.</p>

for biodiversity" (para 6.4.5 refers). This policy and subsequent policies in Chapter 6 of PPW 10 respond to the Section 6 Duty of the Environment (Wales) Act 2016*.

The area of the Wentlooge Levels has seen a revival in species of recent years which has been helped by the Living Levels project. An example of which has been an increase in the sightings of one of the UK's rarest bees, the Shrilla Carder Bee, a significant rise in the swan population together with many other nesting and migrating birds, water vole and dive beetle, just to list a few.

It is important that biodiversity and ecosystem resilience considerations are considered at an early stage in development plan preparation and when proposing or considering development proposals. The Replacement Plan should be proactive in embedding appropriate policies to protect against biodiversity loss and secure enhancement in the area of the Wentlooge Levels.

St Brides is referenced specifically as a possible site of development. Like its neighbouring village of Peterstone it currently has no amenities other than a community hall and there is no regular public transport. For this reason, we feel that St Brides should be designated as a no expansion village in the same way as Peterstone already has been.

Should significant investment be made in local amenities and public transport, development could be more sustainable. This would need to include investment in the local road network, as the road quality is currently poor and in places dangerous. However, any development would need to be within the constraints of the various designations listed above in order to protect the significant environmental, cultural and historical value of this area, which we feel would be hard to achieve.

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GSO 035 - Mr R Herbert - 00174

Question / Response	Officer Response
<p>We set out herein our client's response to the Newport Local Development Plan (rLDP) Growth and Spatial Options consultation paper. Our client, Mr Herbert, owns two sites that are being promoted for development through the rLDP and have been submitted as candidate sites to help deliver the Council's future plan. Mr Herbert is pleased to be able to have the opportunity to feed into the early stages of the Plan preparation process and hopes that our input is helpful in forming the key components of the Plan.</p> <p>We have previously submitted candidate sites for consideration on Mr Herbert's behalf at South and West of Bettws and Risca Road, Rogerstone.</p> <p>Summarily, the site (c.12.5ha) at Bettws is capable of delivering c.450 high quality homes, including specialist housing for the elderly, self-build and affordable housing. In addition it can provide</p>	<p>Candidate Site assessments are being carried out as part of a separate process. The results of the Stage 1 assessment can be found in the Candidate Site's Register. Stage 2 of the assessment will be published as part of the Preferred Strategy consultation.</p>

c.1.5Ha(6,000 to 8,000 sq.m) of employment and community uses (mixed uses) in order to help enhance self-containment and boost the local economy whilst providing onsite space for community groups, classes and clubs etc. The site provides a significant opportunity for long term sustainable development, investment and enhancement of Bettws which would be both deliverable and viable. A site location plan of the candidate site submitted is included at appendix 1 for ease of reference.

The second site submitted at Risca Road, Rogerstone, is capable of accommodating between 10 and 20 self-build units although consideration could also be given to other types of dwellings such as for the elderly or a small scale developer, the area submitted as a candidate site is included at appendix 2 for ease. It is noted that Mr Herbert is also making his land available to be considered as part of a larger area of land with adjoining landowners and separate representations will be made in support of this. It is noted, that the circumstances of the larger site which was submitted at the initial call for sites, but where it was not possible to provide additional information (due to COVID not allowing elderly shareholders to meet and the ill health and subsequent demise of the chairman of Woodland Amenities Limited). We can confirm that the whole of that site is now available for consideration in the RDLP, comprising land belonging to R Herbert, D & M Vaughan and Gwyllt Limited along with land owned by Woodland Amenity Trust who our client is working with. Please see attached location and masterplans for the latest proposal in appendix 3.

Our client is in discussions with prospective house builders and housing associations in respect of both sites and would welcome discussions with the Council on each of the sites on how they can contribute towards the Plan. Indeed, our client is keen to demonstrate that both sites would be deliverable, viable and sustainable such that they can provide a timetable for delivery to feed into the Council's trajectory both in terms of private and affordable homes. Whilst initial work on master planning, viability, ecology, landscape, transport and capacity has been undertaken (much of it previously submitted to the Council), an early meeting with the Council would assist with planning further work that is required on each of the proposals.

Our client's response to the Growth and Spatial Options consultation is set out below and is to be considered against their overarching role which is to assist the Authority in achieving the objectives of the LDP and the Future Wales aspiration for Newport to increase its Strategic Role in the region.

GROWTH OPTIONS:

Growth Scenarios -

1. Are there any scenarios that have been discounted which should be considered further, and why?

We are strongly of the view that it is appropriate to discount the low growth options. In this regard, Policy 33 of Future Wales states that the Welsh Government support an "increased strategic role"

Noted. The Growth Option taken forward is discussed in detail in the Preferred Strategy Cabinet Paper, the Preferred

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<p>however this cannot be a continuation of its existing role or approach towards growth and the benefits that it can bring, rather it requires enhanced levels of growth and investment.</p> <p>Table 1 provides a useful point of reference for establishing how an increased strategic role may be facilitated. Clearly in order to comply with Future Wales the Plan requires a level of growth that is at the very least equal to or greater than the current LDP level of growth. As such it removing the PG Short Term level of growth cannot be justified. Whilst they are very similar, this along with the Dwelling Led 5yr level are the only two approaches that would seek a higher level of growth than is presently the case and therefore comply with Future Wales, all of the others would imply a reduced strategic role.</p> <p>Notwithstanding this, we accept the Council's reasons for discounting at this stage in order to avoid duplication of consideration. We set out the reasons for a higher level of growth in more detail in our answer to question 2 below.</p>	<p>Strategy Consultation Paper and associated Background Papers.</p>
<p>2. Which of the options do you feel is the most appropriate, and why?</p>	
<p>It is clear that the only two options that are appropriate, in line with Future Wales and an increased Strategic Role for Newport are those that are higher than the existing LDP level and in this regard we strongly believe that the Dwelling Led 5yr level is the most appropriate. It is clear that Future Wales anticipates Newport growing "in and immediately adjoining" the settlement and an increased strategic role for the city. As such it is key that an aspirational level of growth is sought that seeks to drive the increase to reflect the strategic role that Newport plays and to drive the regional economy.</p> <p>We would note that Wales as a whole is facing its most significant challenges for some considerable time and it is without question the case that the Replacement LDP is being prepared under some of the most challenging societal and economic conditions since World War Two.</p> <p>There are numerous factors providing the context for the level of growth sought which we believe point towards the higher levels. We set these out summarily below but note their importance in a higher growth requirement.</p>	<p>Noted. The Growth Option taken forward is discussed in detail in the Preferred Strategy Cabinet Paper, the Preferred Strategy Consultation Paper and associated Background Papers.</p>
<p><u>Post Covid 19 recovery, energy crisis and Brexit</u></p> <p>It is clear that Newport faces significant challenges in order to achieve an increased strategic role in the context of the post Covid economy, Brexit Recovery and the ongoing energy crisis. Indeed, over recent years we have experienced exceptional circumstances that have the potential to severely and drastically impact upon the economy and society as a whole. We believe that the planning process must play its part in helping to facilitate the economic recovery that is needed. Plainly economic recovery must form an over-riding requirement of the plan and without question must underlie the approach to be taken. An</p>	<p>Noted. The Growth Option taken forward is discussed in detail in the Preferred Strategy Cabinet Paper, the Preferred Strategy Consultation Paper and associated Background Papers.</p>

<p>appropriate response to achieve an increased strategic role would be to plan for higher levels of growth than over recent plan periods.</p>	
<p><u>Constraints in adjoining Authorities</u> In addition to meeting its own needs the Council will need to consider the lack of housing supply in neighbouring Authorities. Indeed, Future Wales is also clear that "Growth at Newport will help manage the development pressures in the region by providing a strategic growth focus for the eastern part of the area". Newport has not just been dealing with its own needs in recent years and accordingly needs to consider the offsets from new homes not being provided in its neighbouring authorities. Whilst housing land supply requirements were formally abandoned by the Welsh Government, it does not change the record of poor delivery elsewhere and it follows logically that where needs aren't met within an Authority, they will need to be accommodated somewhere. Whilst this is an unsatisfactory and unsustainable position there is unlikely to be any change in this in the short term. Indeed:</p> <ul style="list-style-type: none"> - Torfaen & Caerphilly - as of April 2021 there was a cumulative shortfall across the two Authorities of over 4,000 dwellings from the levels envisaged within their respective Local Development Plans. This represents the number of households that could not be provided for in those respective Authorities. This is a shortfall of national significance that has a profound effect on house prices across the region; and - Monmouthshire - representations made by the Welsh Government on the Monmouthshire rLDP mean that further new housing allocations would not be needed in Monmouthshire. <p>Given the additional constraints in Monmouthshire, including Phosphates and anticipated marine nitrates, it is likely that demand will be displaced from Monmouthshire to adjoining Authorities. Mainly, policy and supply constraints in adjoining Authorities will have a significant impact upon Newport City Council in respect of the housing market and affordability issues. This is a challenge that the LDP needs to respond to with higher growth rates than previous years in order to achieve an increased strategic role.</p>	<p>Noted. NCC is supportive of cross council working and joint working and effectively tackling cross boundary issues.</p> <p>The Growth Option taken forward is discussed in detail in the Preferred Strategy Cabinet Paper, the Preferred Strategy Consultation Paper and associated Background Papers.</p>
<p><u>Meeting needs</u> It will be of utmost importance to ensure Newport establishes a level of growth that meets needs and does not exacerbate the existing supply constraints in South Wales, taking into consideration the shortfalls in adjoining Authorities alongside Newport's own needs. We believe that the highest level of growth will need to be set in order to meet the Vision and fulfil the strategic aspirations for Newport as a Gateway City to Wales. In this regard it is noted that:</p> <ul style="list-style-type: none"> -given the potential impacts of Covid 19 on the economy and society, there will be a need to adopt a highly ambitious strategy which provides far greater flexibility to respond to the crisis through added stimulation of the construction sector; -account should be taken in the baseline figures of the levels of sustainability and selfcontainment that can be achieved through embracing working from home trends for those sectors where it is feasible. 	<p>Noted. The Growth Option taken forward is discussed in detail in the Preferred Strategy Cabinet Paper, the Preferred Strategy Consultation Paper and associated Background Papers.</p>

<p>These are often the high added value jobs that are no longer tied to cities such as Bristol or Cardiff but can retain expenditure in the local area and enhance their vibrancy; and</p> <p>-any requirement should ensure an appropriate level of flexibility for delivery. Indeed, it may be that a 20% flexibility allowance or greater provides an appropriate starting point. We will comment on this further when detailed information becomes available.</p>							
<p><u>Addressing affordability</u></p> <p>The Council's result in approaching its affordable housing target for 2015-2020 is to be welcomed. However, the Council recognise that this is only a small proportion of the actual level of need. The latest Local Housing Market Assessment (LHMA) indicates that "as of the 31st March 2017 there were 6,838 households with active applications on the housing waiting list. In order to clear this backlog during the 5 year life of this LHMA we would need to allocate 1,368 units of accommodation each year". The final stated annual shortfall is 559 per annum which equates to 2,795 over the five year period. This is plainly a significant issue within the Authority which has no doubt been exacerbated by price increases that have been caused due to shortages of housing supply outside of the County.</p> <p>Our client is of the view that the replacement LDP provides an opportunity to seek to address affordability in a meaningful and substantive way.</p>	<p>Noted.</p>						
<p>Are there any other matters that should be taken account of when assessing these scenarios and identifying a Preferred Strategy?</p>							
<p>We have considered the assessment of each of the options and have commented where we believe that the assessment could be reviewed. Importantly, with regards to the lower growth options that are considered (options 2 to 6) in the first instance, we do not believe that these will contribute towards the Future Wales aim for Newport to have an increased Strategic Role in South Wales. This should form part of the assessment.</p>	<p>Noted. The Growth Option taken forward is discussed in detail in the Preferred Strategy Cabinet Paper, the Preferred Strategy Consultation Paper and associated Background Papers.</p>						
<p><u>Option 1: 12,570 new homes and 12,945 jobs</u></p> <p>With regards to the higher growth option we have suggested that a number of the "colours" should be improved based on the potential for positive outcomes. Indeed, greater levels of investment in line with an Increased Strategic Role for Newport would have the potential to bring many significant benefits across the assessment areas. We are strongly of the view that this is the only option that would allow Newport to strive towards an increased Strategic Role in line with Future Wales.</p> <p>Our analysis is below.</p>	<p>This assessment was produced for the purpose of the Growth and Spatial Options consultation, however the Integrated Sustainability Appraisal (ISA) assesses these in more detail.</p>						
<table border="1"> <tr> <td data-bbox="91 1145 356 1222">Economy & Employment</td> <td data-bbox="356 1145 1375 1222">We support the overall conclusions of this assessment</td> </tr> <tr> <td data-bbox="91 1222 356 1299">Population & Communities</td> <td data-bbox="356 1222 1375 1299">We support the overall conclusions of this assessment</td> </tr> <tr> <td data-bbox="91 1299 356 1366">Health & Well Being</td> <td data-bbox="356 1299 1375 1366">We support the overall conclusions of this assessment</td> </tr> </table>	Economy & Employment	We support the overall conclusions of this assessment	Population & Communities	We support the overall conclusions of this assessment	Health & Well Being	We support the overall conclusions of this assessment	
Economy & Employment	We support the overall conclusions of this assessment						
Population & Communities	We support the overall conclusions of this assessment						
Health & Well Being	We support the overall conclusions of this assessment						

Equality, Diversity and Inclusion	We support the overall conclusions of this assessment		
Transport & Movement	Newport has been identified as a location for growth within Future Wales specifically because it is a sustainable location for growth. Its communities are well connected to public transport and well served by facilities. Indeed, our clients' sites at Risca Road are clear examples of this, being within two minutes walking distance of a train station. We note that it is indicated that more opportunities for investment could be apparent under high scenarios, we believe that the Council's assessment should be more positive on this - indeed, higher levels of growth would enable a step change in investment and enhancement that could be a significant benefit. This should be re-assessed as green. Indeed, this is far more likely to be the case than for small scale, incremental and piecemeal infill development and ad-hoc brownfield sites.		
Natural Resources	We are surprised by the comments set out herein, it is noted that water consumption would increase for all options however, there are sustainable means of managing this. Much of the landscape surrounding Newport (where it is not at risk of flooding) is heavily influenced by negative urban impacts. New greenfield sites can provide a means of softening urban edges through more appropriate landscape buffers, open space and interface with rural areas. We also support the notion that greater investment brings the potential for more sustainable lifestyles, as greater facilities would exist and as construction techniques evolve and progress. We are strongly of the view that with appropriate planning interventions, this could be at least an orange category if not green.		
Biodiversity and Geodiversity	Again the categorisation red seems inappropriate (Option 5 and 6 are green) yet brownfield sites have equal (if not greater) chance of disturbing habitats and actually being unable to adequately mitigate. There is significant opportunity to provide ecological enhancement and net gain from greenfield sites, this includes to Sites of Importance for Nature Conservations (SINCs).		
Historic Environment	We would note that each case would need to be dealt with based on its own merits, albeit there are more heritage assets (including Listed Buildings and Conservation Areas) within the urban area than there are in surrounding green fields.		
Landscape	As noted earlier much of the landscape surrounding Newport (where it is not at risk of flooding) is heavily influenced by negative urban impacts. New		

	greenfield sites can provide a means of softening urban edges through more appropriate landscape buffers, open space and interface with rural areas.		
Climate change	With regards to Flooding, there are considerable issues for existing properties in Newport, growth means higher investment and the potential to contribute towards solving existing problems Increased investment in local facilities would mean potentially increasing sustainability. A higher growth strategy will actively prevent growth being dispersed. Indeed, low growth means that people would "jump" the green belt - leading to greater in commuting or travel to Bristol and Cardiff.		
With regards to the remaining options, we note: Option 2: 9,450 new homes and 10,695 Jobs & Option 3: 9,570 new homes and 8,640 jobs Given the similar scale of growth we consider both options in the following table in order to minimise duplication. It is noted in the first instance that these would be contrary to the Future Wales aspiration for Newport to achieve an increased strategic role. We support the overall conclusions of this assessment			This assessment was produced for the purpose of the Growth and Spatial Options consultation, however the Integrated Sustainability Appraisal (ISA) assesses these in more detail.
Economy & Employment	We support the overall conclusions of this assessment		
Population & Communities	We support the overall conclusions of this assessment		
Health & Well Being	We support the overall conclusions of this assessment		
Equality, Diversity and Inclusion	We support the overall conclusions of this assessment		
Transport & Movement	We support the overall conclusions of this assessment for both options.		
Natural Resources	As with option 1, we are surprised by the comments set out herein, it is noted that water consumption would increase for all options however, there are sustainable means of managing this. In addition, much of the landscape surrounding Newport (here it is not at risk of flooding) is heavily influenced by negative urban impacts. New urban extensions can provide a means of softening urban edges through more appropriate landscape buffers, open space and interface with rural areas. We also support the notion that greater investment brings the potential for more sustainable lifestyles, as greater facilities would exist and as construction techniques evolve and progress. We are strongly of the view that with appropriate planning interventions, this could be at least an orange category if not green.		

Biodiversity and Geodiversity	Again the categorisation seems inappropriate (Option 5 and 6 are green) yet brownfield sites have equal (if not greater) chance of disturbing habitats and actually being unable to adequately mitigate. There is significant opportunity to provide ecological enhancement and net gain from greenfield sites, this includes to SINCs and Special Areas of Conservation (SACs).		
Historic Environment	It is unclear why options 2 and 3 are scored differently. We would note that each case would need to be dealt with based on its own merits, albeit there are more heritage assets (including Listed Buildings and Conservation Areas) within the urban area than there are in surrounding greenfield.		
Landscape	We support the overall conclusions of this assessment		
Climate change	With regards to flooding, there are considerable issues for existing properties in Newport, growth means higher investment and the potential to contribute towards solving existing problems. Increased investment in local facilities would mean potentially increasing sustainability. A higher growth strategy will actively prevent growth being dispersed. Indeed, low growth means that people would “jump” the green belt – leading to greater in commuting or travel to Bristol and Cardiff.		
<p>P S O S N C</p> <p>Option 4: 7,950 new homes and 9,405 Jobs, Option 5: 8,100 new homes and 6,720 jobs & Option 6: 6,605 new homes and 5,835 jobs</p> <p>Given that Options 4, 5 and 6 are low growth options with broadly similar levels of new homes, we set out our combined comments on these options below in order to avoid duplication. It is noted in the first instance that these would be contrary to the Future Wales aspiration for Newport to achieve an increased strategic role.</p>			This assessment was produced for the purpose of the Growth and Spatial Options consultation, however the Integrated Sustainability Appraisal (ISA) assesses these in more detail.
Economy & Employment	We are of the view that these low growth options should all be categorised as red as they would not provide the combination of jobs and homes required to provide an increased strategic role for Newport		
Population & Communities	We are of the view that these low growth options should all be categorised as red as they would not provide the combination of jobs and homes required to provide an increased strategic role for Newport		
Health & Well	Being At the lower scales of growth these options are unlikely to provide the investment required in such facilities rather it would be a continuation of existing levels.		
Equality, Diversity and Inclusion	We support the overall conclusions of this assessment however, question whether this should be red given the importance of meeting needs.		

Transport & Movement	With each option there would be fewer opportunities for significant levels of investment in improved infrastructure or sustainable means of travel.		
Natural Resources	It is clear that lower growth levels would require less greenfield land which would clearly result in a continuation of the existing urban / rural interface. However, there are areas that could benefit from new landscaping / planting to soften the interface and provide visual benefits in this regard.		
Biodiversity and Geodiversity	The categorisation seems inappropriate and it is unclear why options 5 and 6 are green yet brownfield sites have equal (if not greater) chance of disturbing habitats and actually being unable to adequately mitigate due to more limited land availability on site. They do not have the same level of opportunity to provide ecological enhancement and net gain as greenfield sites, this includes to SINC and SACs.		
Historic Environment	We would note that each case would need to be dealt with based on its own merits, albeit there are more heritage assets (including Listed Buildings and Conservation Areas) within the urban area than there are in surrounding greenfield.		
Landscape	It is clear that lower growth levels would require less greenfield land which would clearly result in a continuation of the existing urban / rural interface. However, there are areas that could benefit from new landscaping / planting to soften the interface and provide visual benefits in this regard.		
Climate change	With regards to Flooding, there are considerable issues for existing properties in Newport, growth means higher investment and the potential to contribute towards solving existing problems. There would potentially be less investment in sustainability. Lower growth is likely to contribute towards increased commuting whereby people would be priced out of the local market and "jump" the greenbelt to alternative locations where homes are available.		

EMPLOYMENT LAND OPTIONS:			
Recommendation One -			
4. Is this requirement appropriate for Newport?			
We are supportive of the recommendations of the Employment Land Review which seek to protect 157.8 ha of supply in order to achieve the 77ha requirement. We believe that this approach provides flexibility to achieve the Future Wales approach towards increasing the Strategic Role of Newport.			Noted
5. Should it be different and if so, why?			
As noted above, we support the recommendations of the Employment Land Review. Recommendation Two -			Noted

6. Should some sites be removed from the employment supply? Why?				
<p>The Employment Land Review recommends that all the sites listed in Table E1 of the Executive Summary are retained within the RLDP, this includes both the Solutia Site and Queensway Meadows, therefore it is unclear why their removal is being considered, further clarity over this would be required in order for us to consider further but based on the evidence available to date we oppose the removal of employment land.</p> <p>It is noted that if Newport is to achieve its increased Strategic Role, it is imperative that it is providing a balance of jobs and homes and a significant supply of deliverable land for both purposes is available.</p>		Noted. The Employment Land Review (NB not executive summary) discusses this in more detail, including the recommendations regarding East of Queensway Meadows at section 8.8.		
7. Should alternative land uses be considered for some sites? Please provide examples of such uses and your rationale for this.				
Given our response to question 6, we have no further comments on this question.		Noted		
8. Which of these options do you feel is the most appropriate, and why?				
<p>We consider that the urban expansion option provides the most appropriate solution, this is framed on our approach towards growth which is based on the higher growth option (1) being the only approach that would be in compliance with Future Wales (i.e. an increased strategic role for Newport). For this reason we believe that the previously developed land (PDL) approach and Village Focus approaches should both be ruled out at this stage.</p>		Noted. The Spatial Option taken forward is discussed in detail in the Preferred Strategy Cabinet Paper, the Preferred Strategy Consultation Paper and associated background papers.		
<p><u>Urban Expansion & Hybrid Options</u></p> <p>We note that there are various overlaps between the Urban Expansion and Hybrid Options, and we consider them jointly in the below table given the similarities. Indeed, we believe that given the lack of large suitable previously developed sites that may be available as new allocations, the PDL element is likely to be comprised of those existing allocations that are proven to be deliverable and capable of being rolled over alongside a small scale windfall assumption. As such with both options the amount of greenfield expansion land is likely to be similar given the scale of growth required in order to meet the strategic role of the City. However, we note that in respect of villages, it is likely to only be appropriate to consider small scale development parcels to meet local needs, rather than any significant scale of expansion.</p>		This assessment was produced for the purpose of the Growth and Spatial Options consultation, however the Integrated Sustainability Appraisal (ISA) assesses these in more detail.		
Our comments in respect of the assessment of both is set out below.				
<table border="1"> <tr> <td>Economy & Employment</td> <td>Future Wales is clear that growth should be in and around Newport. As such, this approach would clearly be in line with the policy hierarchy. It is noted that over recent years there has been a concentration of development in the east of the City, there would be an opportunity with sustainable greenfield sites to re-focus on the west, north west and north of the City. We are strongly of the view that this should be green for both the Urban Expansion option and the Hybrid Option.</td> </tr> <tr> <td>Population & Communities</td> <td>We support the overall conclusions of this assessment with respect to Urban Expansion and believe that the same conclusions could be drawn from the</td> </tr> </table>	Economy & Employment		Future Wales is clear that growth should be in and around Newport. As such, this approach would clearly be in line with the policy hierarchy. It is noted that over recent years there has been a concentration of development in the east of the City, there would be an opportunity with sustainable greenfield sites to re-focus on the west, north west and north of the City. We are strongly of the view that this should be green for both the Urban Expansion option and the Hybrid Option.	Population & Communities
Economy & Employment	Future Wales is clear that growth should be in and around Newport. As such, this approach would clearly be in line with the policy hierarchy. It is noted that over recent years there has been a concentration of development in the east of the City, there would be an opportunity with sustainable greenfield sites to re-focus on the west, north west and north of the City. We are strongly of the view that this should be green for both the Urban Expansion option and the Hybrid Option.			
Population & Communities	We support the overall conclusions of this assessment with respect to Urban Expansion and believe that the same conclusions could be drawn from the			

	Hybrid Option due to the fact that a similar quantum of greenfield development will be required in both scenario.		
Health & Well	We support the overall conclusions of this assessment with respect to the Hybrid Option but believe that the same conclusions could be drawn from the Hybrid Option due to the fact that a similar quantum of greenfield development will be required in both scenario.		
Equality, Diversity and Inclusion	We believe that for both Urban Expansion and Hybrid Options, the assessment should be green. Indeed, both will facilitate significant opportunities for improvements and this should not be down played.		
Transport & Movement	Newport has been identified as a location for growth within Future Wales specifically because it is a sustainable location for growth. Its communities are well connected to public transport and well served by facilities.Indeed, our clients' sites at Risca Road) are a clear example of this, being within 2 minutes walking distance of a train station.We note that it is indicated that more opportunities for investment could be apparent under high scenarios, we believe that the Council's assessment should be more positive on this - indeed, higher levels of growth would enable a step change in investment and enhancement that could be a significant benefit. This should be re-assessed as green. Indeed, this is far more likely to be the case than for small scale, incremental and piecemeal infill development and ad-hoc brownfield sites.		
Natural Resources	We are surprised by the comments set out herein, it is noted that water consumption would increase for all options however, there are sustainable means of managing this.Much of the landscape surrounding Newport (where it is not at risk of flooding) is heavily influenced by negative urban impacts. New greenfield sites can provide a means of softening urban edges through more appropriate landscape buffers, open space and interface with rural areas. This has been actively demonstrated on our clients' sites which act as a gateway site to Newport from Caerphilly.We also support the notion that greater investment brings the potential for more sustainable lifestyles, as greater facilities would exist and as construction techniques evolve and progress. We are strongly of the view that with appropriate planning interventions, this could be at least an orange category if not green.		
Biodiversity and Geodiversity	Again the categorisation seems inappropriate yet brownfield sites have equal (if not greater) chance of disturbing habitats and actually being unable to		

	adequately mitigate. There is significant opportunity to provide ecological enhancement and net gain from greenfield sites, this includes to SINC. This is demonstrated by work undertaken on our clients' sites, where there are significant opportunities for betterment.	
Historic Environment	We would note that each case would need to be dealt with based on its own merits, albeit there are more heritage assets (including Listed Buildings and Conservation Areas) within the urban area than there are in surrounding green fields. Sites within our clients' control would have no impacts on heritage assets.	
Landscape	As noted earlier much of the landscape surrounding Newport (where it is not at risk of flooding) is heavily influenced by negative urban impacts. New greenfield sites can provide a means of softening urban edges through more appropriate landscape buffers, open space and interface with rural areas.	
Climate change	With regards to Flooding, there are considerable issues for existing properties in Newport, growth means higher investment and the potential to contribute towards solving existing problems. As such, sites such as our clients where flooding is not a constraint but are in sustainable locations form a solution to this and cannot be considered negative. Increased investment in local facilities would mean potentially increasing sustainability. Appropriate levels of growth being identified would prevent growth being dispersed across numerous local authorities which has happened over recent years due to supply constraints. Low growth means that people would "jump" the green belt - leading to greater in commuting or travel to Bristol and Cardiff.	
10. Are there any other matters that should be given consideration when assessing these?		
In supporting our assessment of both the highest growth option and spatial approach which requires greenfield land, we set out below a number of key considerations in the benefits that they can bring. In particular in helping Newport to achieve an increased strategic role but also in terms of the other key assessment areas.		Noted
<u>Sustainable urban extensions</u> Our client is of the view that it will be important to consider all scales of potential development from minor rounding off of settlements and infill to sustainable urban extensions in line with Future ales. Indeed, the Welsh Government's guidance, "Building Better Places" actively seeks to achieve rounded communities based on the underlying principles of place making.		Noted. The Deposit Plan will include reviewed urban and village boundaries.

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

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

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

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

These concepts are best delivered through consideration of longer term time horizons and wider geographical areas so that the benefits of strategic solutions are explored. The alternative of short term, small scale, incremental and dispersed change will not yield the same overall benefits. Importantly, by applying a coherent and distinctive urban design concept and master planned approach that combines innovative solutions and reflection of local characteristics, such extensions can provide the opportunity to create a new development that has a strong local identity. This will facilitate effective integration with the existing community for whom there should be major benefits particularly in relation to supporting the existing economy and creating jobs but also in the provision of a range of housing sizes, styles and

<p>tenures to accommodate those currently priced out of the local housing market. This accords with a wide range of national planning policy requirements.</p>	
<p><u>Sustainable growth locations</u> It is inevitably the case that the supply of brownfield sites in Newport for redevelopment for residential purposes is limited. As such, the Council will need to consider sustainable and appropriate greenfield locations based around existing communities. In reality, this is likely to focus on the western and north western parts of the County extents associated with existing built form and communities. Indeed, we are of the view that the LDP must not neglect the requirements of these existing communities in favour of more remote areas on the Eastern side of the City that would be more aligned to commuting patterns along the M4. It is anticipated that such focal points for proportionate growth include a number of existing communities where there are a number of local facilities that can provide an opportunity to maximise levels of self-containment and sustainability. Indeed, proportionate growth can help to reinforce existing levels of sustainability but also seek to provide additional facilities and uses that can move to a greater level of neighbourhood and community well-being. In this regard, our clients consider that Bettws and Rogerstone are suitable locations to accommodate further sustainable growth.</p>	<p>Noted. The Deposit Plan will include reviewed urban and village boundaries.</p>
<p><u>Bettws</u> Our client controls a large area of land immediately adjoining the southern and western settlement boundary of Bettws. It offers a number of potential ways in which it could contribute to meeting needs and placemaking. It provides the potential to help deliver a significant number of homes and job opportunities for local people as noted earlier. Indeed, this is an opportunity to help to create a more sustainable self-contained community that could offer a range of land uses including residential, employment, community, recreation and commercial. This could help to create a 21st century neighbourhood in which all of the residents' everyday needs could be met within walking/cycling distance. The sustainable site Our clients site extends from the Llwynhaid Farmyard Courtyard in the west and wraps around the settlement towards the former comprehensive school redevelopment site from which is separated by two fields which would also be suitable for development. It is crossed by Henllys Lane and Bettws Brook in east/west direction and by Parc-y-Brain Road in a north/south direction. To the north the site is bound by the existing settlement, and the southern boundary is defined by the adjoining woodland and fields which also form part of the western boundary. The eastern edge is formed by trees and the fields separating the site from the new housing on the former school site. Given its extent, it is very well contained by both physical and natural boundaries and has limited visibility in the wider context. Bettws is a well-established, stand-alone local community that is popular with extended family groups and this proposal would offer opportunities to increase the variety of housing, freeing up larger properties and</p>	<p>The Deposit Plan will include reviewed urban and village boundaries.</p>

providing for ageing residents as well as new affordable housing for the younger generations in close proximity to excellent education facilities. Newport City Centre is within easy reach by walking, cycling and existing frequent public transport links.

The offer

The site is capable of delivering c.450 high quality homes (c.12.5Ha), including specialist housing for the elderly, self-build and affordable housing. In addition it can provide c.1.5Ha / 6000 to 8000 sq.m of employment and community uses (mixed uses) in order to help boost the local economy and provide onsite space for community groups, classes and clubs etc.

Our clients are discussing a comprehensive approach with Barratt Homes who control adjoining land which would facilitate an additional 200 new homes along with the mixed use extension proposed by Mr Herbert.

The site is within a sustainable location being close to local shops, schools and community facilities and being served by existing bus routes. It forms a significant opportunity to provide investment in these facilities and to increase the level of self-containment of Bettws through providing new homes and other land uses that could add to the level of local facilities. The site is within easy walking distance of several bus stops served by regular bus routes, typically 20 minute frequency, to and from Newport running along Monnow Way. These services would be within 400 metres of the proposed development areas but a bus route could be diverted to run through the site. In addition, the canal towpath to the east of the site offers an easy and pleasant foot/cycle path route into the City Centre, which is approximately 4km in distance.

At the centre of Bettws there are a number of local facilities, including shops, a Spar shop, post office, newsagent and hairdresser as well as several denominations of church, a library, a health centre, chemist, dental surgery and local police station, all within close proximity. The demand for retail units within the local centre rose significantly during lockdown with residents making more use of local facilities. Furthermore, Monnow Primary School is approximately 400m away and Newport High School within 750m of the site. There is also a local Welsh speaking primary at Ysgol Gymraeg Ifor Hael. Additionally Bettws has a number of established sports grounds, playing fields and a leisure centre (active living centre associated with the High School).

Sustainable neighbourhood planning

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

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

The early concept proposals that have been submitted to the Council demonstrate that proposed development has been guided to lower lying land, areas that possess natural vegetative screening, and which benefit from intervisibility with the existing urban area. In these areas development will work with the site's topography and existing landscape features, such as hedgerows and Public Rights of Way, to create a new neighbourhood that respects the grain of the landscape and which can sensitively integrate development into its context.

Development on higher, more exposed areas which are visually separated from the existing urban area will not take place, and instead these areas will be utilised for parkland and open space. Moreover, development will ensure that all new houses will have easy access to open space, opportunities for play and a network of new footpath and cycle routes linking east to west and north to south. These routes will ensure connectivity to the existing urban area as well as promoting access to the wider countryside. Community uses, specialist housing for the elderly and local employment uses will all be explored to ensure that this development supports the local economy and promotes social cohesion. The development will create an interconnected network of both green and blue infrastructure. This will include new woodland and meadow creation, wetland establishment and a comprehensive Sustainable Drainage System. The development will target a significant Biodiversity Net Gain.

It is considered that the existing community will benefit from the significant investment and opportunities that an extension located at Bettws would bring. Indeed, Bettws is itself a sustainability community with a range of shops, schools and facilities and is very well served by public transport.

However, it is in need of investment and opportunities in order to help reduce localised inequalities.

There exists a significant opportunity to increase the level of self-containment of Bettws through providing new homes and other land uses that could add to the level of local facilities.

Summary

It provides the opportunity to contribute towards the vision and objectives, as well as addressing many of the issues raised in the assessment. Indeed, the location of growth can help with the creation of a new 21st century neighbourhood for Bettws that ensures 'good growth' by balancing development with Green Infrastructure, and which positively plans for social infrastructure from the initial master planning stage. Proposals can work with the landscape in order to effectively integrate a new neighbourhood into both Bettws and its local context. A comprehensive approach to the site's planning; including consideration of access, open space, public transport and biodiversity will continue to evolve the proposals and the landowner is committed to working with the local authority and wider community as proposals develop. In addition, the adjoining land promoted by Barratt Homes could add a further 200 dwellings to Mr Herbert's mixed community

Rogerstone

Our client also controls land at Risca Road, Rogerstone. The site is approximately 1ha in size and broadly rectangular in shape. It is located immediately adjoining the north western extent of the settlement

The Deposit Plan will include reviewed urban and village boundaries.

boundary for Rogerstone. It is a former allotment garden that has degraded in its quality. To the south the site adjoins Risca Road. To the east is housing fronting Risca Road, beyond which is further residential development.

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

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

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

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

The wide array of local facilities affords an opportunity for future residents to maximise the proportion of their everyday lives within their local neighbourhood without relying upon the need for private car trips. Indeed, everyday needs can be catered for in the local neighbourhood and more strategic trips (for instance to the centre of Newport or Cardiff) can be made via the South Wales Metro system, reaching such destinations within 10 to 20 minutes and reducing the need to travel by car.

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

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

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

<p>2. to support and enhance existing facilities and services through providing homes in an appropriate location;</p> <p>3. to provide an opportunity to focus development around the existing train station which acts as a hub where such intensification is entirely appropriate and sustainable, helping to create a move away from reliance upon the private car;</p> <p>4. to capitalise on its location in close proximity to the canal to the north and the recreational benefits associated;</p> <p>5. to increase access to other formal recreation utilising the wide range of existing facilities located nearby including the Multi Use Games Area (MUGA) at the Rivermead Centre, Risca Leisure Centre, Newport Golf Club and Rogerstone Welfare as well as the cricket clubs at High Cross, Whiteheads and Pontymister cricket and bowls facilities;</p> <p>6. to enhance the entrance into both Rogerstone and Newport from Caerphilly in the north. Indeed, the site can become an attractive gateway into the Authority;</p> <p>7. to adopt an approach to design that reflects the traditional local character, density and appearance; and</p> <p>8. to make appropriate use of a former allotment site to provide a betterment in terms of green infrastructure and biodiversity through enhancements on site and off site if required.</p> <p>It is noted that Mr Herbert is also making his land available to be considered as part of a larger area of land with adjoining landowners and separate representations will be made in support of this. It is noted for ease, that the circumstances of the larger site which was submitted at the initial call for sites, but where it was not possible to provide additional information (due to COVID not allowing elderly shareholders to meet and the ill health and subsequent demise of the chairman of Woodland Amenities Limited) We can confirm that the whole of that site is now available for consideration in the RDLP, comprising land belonging to R Herbert, Woodland Amenities Limited, D & M Vaughan and Gwyllt Limited . Please see attached location and masterplans.</p>	
<p>EVIDENCE BASE:</p> <p>11. Are there any other pieces of evidence that you believe should inform the development of the preferred growth and spatial options strategies?</p>	
<p>It is noted that only limited evidence is currently available and it is clear that there will be a need to publish significantly more evidence in respect of matters such as supply of housing land.</p>	<p>Noted</p>
<p>12. Are there any other comments you'd like to make regarding anything within this consultation document? Do you agree with the Objectives for the RLDP? If not, how and why do you think they should be changed?</p>	
<p>We have commented previously on the Objectives of the RLDP and reserve the right to comment further once the updated Objectives are consulted upon.</p> <p>For ease of reference, it is noted that in general terms we are supportive of the overall approach towards the objectives, however, we believe that particular attention is needed with regards to economic and population / community objectives. As we have stated earlier, there are significant challenges ahead and</p>	<p>Noted. The Deposit Plan will include reviewed urban and village boundaries.</p>

<p>it must be the role of the planning process to help address these issues rather than constrain recovery and realignment.</p> <p>We are strongly of the view that well planned urban extensions can contribute towards a range of the key objectives not just in respect of population and communities, inclusive of:</p> <ul style="list-style-type: none"> • including a variety of housing types, tenures and densities along with neighbourhood centres with mixed uses and a range of facilities; • providing a landscape structure that builds on existing assets, including green infrastructure within the development, linking urban areas to the countryside beyond and creating a distinctive edge to the urban area; • providing opportunities for people to work locally and for small businesses to set up, grow and thrive • addressing the challenges that exist in the aftermath of Brexit and Covid and ensure that Newport can embrace and facilitate new markets and technologies; • presenting an opportunity to design energy efficient communities; • allowing pedestrian, cycle and public transport networks to be fully integrated, often improving services available to the adjacent communities, increasing health and well-being by reducing the reliance on cars; and <p>Supporting the surrounding communities by offering facilities not available locally and by providing affordable housing for people in the care and support sectors they can ensure that the elderly can continue to live independently amongst friends and family reducing the costs of providing social and nursing care.</p>	
<p>Other comments</p>	
<p>It is noted that our client is currently in the process of liaising with house builders and housing associations in respect of refining development proposals for both sites. However, they would welcome engagement with the Council on whether they consider either site could play a role in the delivery of sustainable communities through the replacement LDP.</p>	<p>Noted</p>

GSO 036 - The Coal Authority - 00324

Question / Response	Officer Response
<p>The Coal Authority is a non-departmental public body sponsored by the Department for Energy Security and Net Zero. As a statutory consultee, The Coal Authority has a duty to respond to planning applications and development plans in order to protect the public and the environment in mining areas.</p> <p>Our records do not indicate the presence of any recorded coal mining features at surface or shallow depth, which may pose a risk to surface stability, in the Newport City Council area. On this basis the Planning team at the Coal Authority have no specific comments to make on this consultation.</p>	<p>Noted.</p>

<p>GROWTH OPTIONS: Growth Scenarios - 1. Are there any scenarios that have been discounted which should be considered further, and why? 2. Which of the options do you feel is the most appropriate, and why? Assessment of Growth Options Against RLDP Objectives - 3. Are there any other matters that should be taken account of when assessing these scenarios and identifying a Preferred Strategy?1 Growth Options</p>	
<p>1. We agree with the approach to discount the low-growth scenarios (Employment-led OE+D Uplift; Employment-led OE, WG- 2018-LOWPOP and WG-2014-Principal). As discussed in the Growth and Spatial Options document, these scenarios would result in a low growth strategy that does not align with the Future Wales National Plan 2040 policy intentions for Newport as a 'National Growth Area' for employment and housing and therefore should not need further consideration in the preparation of the RLDP.</p> <p>2. We support an option for an ambitious level of housing and employment growth targets to reflect Newport's role as a key area for national growth, as per Future Wales: National Plan 2040.</p> <p>3. We support the approach taken, which assesses the scenarios against each of the RLDP objectives.</p>	<p>Noted</p>
<p>EMPLOYMENT LAND OPTIONS: Recommendation One - 4. Is this requirement appropriate for Newport? 5. Should it be different and if so, why? Recommendation Two - 6. Should some sites be removed from the employment supply? Why? 7. Should alternative land uses be considered for some sites? Please provide examples of such uses and your rationale for this.</p>	
<p>4. Yes. Recommendation One for an employment land requirement of 77ha is deemed appropriate for Newport.</p> <p>Future Wales: National Plan 2040 identifies Newport as a nationally important area for housing and employment growth (Policies 1 and 33). The RLDP must accord with National Policy objectives and therefore a positive strategy that supports a strong level of employment growth is considered appropriate.</p> <p>Policy 33 of Future Wales states that "the Welsh Government supports an increased strategic role for Newport as a focus for sustainable, long term growth and investment." (emphasis added). As stated within the Employment Land Review (ELR) undertaken by BE Group (February 2022), Newport has a</p>	<p>Noted. The Growth Option taken forward is discussed in detail in the Preferred Strategy Cabinet Paper, the Preferred Strategy Consultation Paper and associated Background Papers.</p>

strong workforce of 70,000 employees (BRES, 2020); positively contributes to the economy of the wider Cardiff Capital Region (CCR) (12.7%); and has seen a strong level of employment growth (11.8% between 2000 and 2020 (pp. 3.18)). This level of employment growth substantially exceeds the growth rates recorded for CCR (2.4%), Wales (0.7%) and Great Britain (4.4%). In order to comply with national policy and achieve an increased strategic role for Newport, the RLDP should adopt an appropriately ambitious growth strategy.

We agree that it is not appropriate to adopt the alternative Oxford Economics (OE) projections, which underestimate projected growth and forecast a negative need for employment land over the plan period. The OE method assumes that any declining employment land supply could be easily taken up by any potential growth sectors, whereas in reality, former industrial sites are not necessarily appropriate for growing office demand, for example (ELR, pp. 7.22). We therefore support the evidence and findings provided within the ELR, which considers growth sectors only and recommends using past rates of delivery as a reliable method for predicting future employment demand for Newport, resulting in the 77ha employment land requirement presented in Recommendation One.

We also note that the ELR confirms that the identified employment site allocations provide a supply of land amounting to 157.8ha, which is more than sufficient to meet the 77ha requirement.

Response 4: No, for the reasons stated above in respect of Question 4, the requirement should not be different.

Response 5: We support Recommendation Two of the ELR regarding the status of employment land allocations. In particular, we agree that the Celtic Springs allocation (Ref: iii), which comprises 6ha of land for B1/B2/B8 Use, continues to provide an important economic function for Newport and should be retained within the RLDP. The allocation is a sustainable site that will positively contribute towards meeting Newport's employment needs for the future plan period. The ELR reviews existing allocated employment sites (summarised at Table 9), which states that Celtic Springs (allocation ref: iii) is centrally located within the business park; is serviced; benefits from having no constraints; and is deemed appropriate for B1 office uses. Celtic Springs scores very highly within the ELR's Site Grading (which is a scoring system based on Welsh Government guidance, measuring accessibility, environmental factors and market attractiveness) scoring a total 13 points out of 15. Celtic Springs is therefore "a well-positioned, attractive site with minimal adverse features" (ELR, pp. 6.9), worthy of retaining within the RLDP.

The ELR also contains an assessment of existing employment areas (summarised at Table 13) which considers that the wider Celtic Springs business park is a good quality employment area with good connectivity to key transport links along the M4 and A48. The Celtic Springs employment area is given a high score of 26 out of 30, which is based on Welsh Government guidance and considers built forms, access, amenity and quality. Retaining the Celtic Springs allocation (ref: iii) within the RLDP to support the future employment land supply in Newport is therefore favourable. This recommendation also

<p>accords with Planning Policy Wales 11 intentions for Development Plans to protect existing employment sites of strategic and local importance (pp. 5.4.3).</p> <p>7. No comment.</p>	
<p>EVIDENCE BASE:</p> <p>11. Are there any other pieces of evidence that you believe should inform the development of the preferred growth and spatial options strategies?</p> <p>12. Are there any other comments you'd like to make regarding anything within this consultation document? Do you agree with the Objectives for the RLDP? If not, how and why do you think they should be changed?</p>	
<p>11. No comment.</p> <p>12. To summarise, we support Recommendation One to allow for 77ha of employment land for the future plan period. We also support Recommendation Two, with regards to the retention of Celtic Springs allocation (ref: iii) within the RLDP.</p>	Noted

GSO 038 - Redrow Homes (South Wales) Limited - 00640

Question / Response	Officer Response
<p>We write on behalf of our client, Redrow Homes (South Wales) Ltd ('the client'), to provide a response to Newport City Council's (NCC) Growth and Spatial Options consultation in preparation of the Replacement Local Development Plan (RLDP) 2021-2036, in respect of their land interests at Calon Y Pentre, Langstone (see site location plan at Appendix A).</p> <p>The above site was promoted through the Council's previous Call for Candidate Sites consultation for residential-led development in August 2021. Further details on the above site and our response to the Council's Growth and Spatial Options Paper, subject of this consultation, are set out further in this letter.</p>	<p>Candidate Site assessments are being carried out as part of a separate process. The results of the Stage 1 assessment can be found in the Candidate Site's Register. Stage 2 of the assessment will be published as part of the Preferred Strategy consultation.</p>
<p>Growth Options</p> <p>The Council has identified several growth options which are to be tested to determine the most suitable and sustainable strategy for housing and employment growth up to 2036. The testing of a range of growth scenarios was commissioned independently by the Council, incorporating the latest demographic evidence (including the initial 2021 Census results), to assist with their assessment of the appropriate level of growth for the city.</p> <p>The findings of The LDP Demographics report (September 2022), prepared as evidence base to support the emerging RLDP, shows that over the plan period Newport will experience population growth of between 4% and 14.9% (as estimated under the range of scenarios tested).</p> <p>On a regional basis, the population of the Cardiff Capital Region (which includes Newport) is ageing, and it is likely that a quarter of the population will be aged over 65 years old by 2039. As such, the available workforce is shrinking, and the city of Cardiff is projected to be the only local authority in the region with a growing population aged 16-64 between now and 2039. Consequently, the Cardiff Capital Region City Deal is looking to create an additional 25,000 new jobs within the region.</p>	<p>Noted. The Growth Option taken forward is discussed in detail in the Preferred Strategy Cabinet Paper, the Preferred Strategy Consultation Paper and associated Background Papers.</p>

A significant increase in the level of housing planned within the region is required in order to underpin the economic aspirations and opportunity provided by the City Deal.

The consultation paper acknowledges that when considering all eleven growth scenarios, some of these were deemed unreasonable and therefore discounted from assessment against the Integrated Sustainability Appraisal (ISA). The employment-led scenarios tended to result in a negative need for employment land over the plan period with outputs much lower than the adopted growth strategy. The consultation document also sets out that where scenarios have been assessed and result in a low scale of growth, these have been discounted from further assessment as they did not align with Newport's focus for growth.

Future Wales: The National Plan 2040, identifies Newport within a National Growth Area which will be the main focus for growth and investment in the south east region (Policy 33). The Welsh Government supports an increased strategic role for Newport as a focus for sustainable long-term growth and investment. The Council's strategy to discount any scenario that resulted in a low scale of growth is therefore strongly supported given that this complies with national policy and continues to support the role Newport has to play in delivering growth for the south east region.

The consultation paper also recognises that of the six growth scenarios taken forward for further assessment, these scenarios propose a wide range of potential housing and employment need. However, the Council acknowledges that new jobs need to be supported through housing growth as this is essential in enhancing Newport's economic role within the region and avoiding the need to commute outwards to work. We strongly support the Council's recognition that the delivery of housing is required to support jobs and prevent outwards commuting as for any economic growth strategy it is vital that housing growth underpins jobs growth as one cannot come forward without the other.

We generally support growth options 1 (Dwelling-led 5YR), 2 (WG-2018-HIGHPOP) and 3 (Dwellingly 10YR). These three growth scenarios also perform best against the emerging RLDP objectives of 'Economy and Employment', 'Population and Communities' and 'Health and Wellbeing'. We consider that to deliver against the Welsh Government's requirement for promoting Newport's strategic role, an increase in growth should be attributed to the city. It is also considered that apportioning a greater amount of growth to Newport will help manage the development pressures in the region by providing a strategic growth focus for the eastern part of the south east region, in accordance with the requirements of Future Wales.

In addition to directing development towards Newport as a National Growth Area, national policy also requires development to be sustainably located with easy access to public transport and other public services. In accordance with policy, the site which is subject to these representations is suitable for delivering a range and choice of housing (including affordable housing) in a sustainable location on a deliverable site. This can contribute towards the resilience of the RLDP's housing trajectory, the effectiveness of the emerging plan and aid towards defining Newport as a strategic growth area.

Spatial Options

The Council's Growth and Spatial Options Paper sets out several spatial options available for supporting the delivery of new growth in Newport up to 2036. One spatial option considered is prioritising the re-use of previously developed land (PDL). Although we do not necessarily oppose this option, it should be recognised that there is a lack of suitable, viable and deliverable brownfield sites within the city.

Therefore, the release of greenfield land is required to meet the need for new housing. The greenfield site subject to this consultation response is free of any major constraints and is sustainably located such that it is available and deliverable for residential development.

Two alternative options, being 'urban expansion' and 'village focus', are also being considered as spatial options as part of preparing the RLDP. In terms of taking an urban expansion approach, the consultation document explains that this would require the identification of land on the edge of the urban boundary whereas a village focus would constitute directing development towards nine defined villages. These spatial options are generally supported as targeting development under either approach would see sustainable sites come forward given proximity to existing established settlements and the associated ease of access to public transport and other public services.

In terms of Langstone's options to accommodate much needed growth, it is important to note that there have been no new housing allocations in the settlement in successive plan periods (i.e., the Unitary Development Plan and the current adopted LDP). There are significant constraints to Langstone's growth, including:

The Coldra Roundabout, Junction 24 of the M4 and the A449 provide a strong defensible boundary to the west of the settlement;

The north of the settlement (which is expected to become a Green Belt Area for Consideration, as set out in Future Wales: The National Plan 2040) largely comprises Grade 2 BMV agricultural land along with the east of the settlement;

- The south of the settlement is constrained by the M4; and

- An acceptance that there are limited, if any, remaining available and viable brownfield sites within the settlement.

Notwithstanding the challenging constraints to growth that exist elsewhere surrounding Langstone, we consider that our client's site at Calon Y Pentre is the most sustainable and best location to accommodate the settlement's growth being located in the heart of the village closest to its facilities, amenities, and public transport links. The site proposes housing growth in a location well related to existing employment opportunities (at Langstone Business Park) and neighbourhood facilities, and therefore demonstrates the holistic approach sought by PPW, which seeks the right development in the right place to achieve sustainable placemaking outcomes.

A range and choice of housing can be provided on site. Redrow are committed to creating a place which will be suitable and attractive for new residents, and which will embrace the increasing ability to work

Noted. The Spatial Option taken forward is discussed in detail in the Preferred Strategy Cabinet Paper, the Preferred Strategy Consultation Paper and associated background papers.

The Deposit Plan will include a review of the urban and village boundaries.

flexibly and from home. As well as providing for a wide mix of house types and sizes, Redrow's home design and digital connectivity ensures that working from home is an attractive option. There is also the potential for the site to provide additional ancillary neighbourhood facilities (for example, a community building or healthcare facility). The potential to incorporate this will depend on the level of growth attributed to Langstone and other sites which come forward.

Calon y Pentre proposes housing in a landscape setting with significant multifunctional green space (comprising circa 56% of the overall development area). Opportunities for local food production through the provision of a community orchard and local grow spaces can be provided along with the provision of children's play facilities and nature walks incorporating educational boards to promote social interaction and activities for the whole community. The RLDP Integrated Sustainability Appraisal Scoping Report (AECOM, 2021) identifies that Langstone has a significant shortfall of 6.42 hectares of open space. The proposal therefore provides the opportunity for existing residents to utilise the open space provided as part of the development to the benefit of the existing community. The site is best placed out of all other options for Langstone's growth to provide this benefit owing to its central location within the settlement. Calon y Pentre would therefore help create and sustain the community and accord with PPW and Policy 2 of Future Wales.

Our client's site is located adjacent to the existing settlement boundary and is free from any overriding unresolvable physical constraints, including infrastructure and utilities, access, ground conditions, landscape, heritage designations, flood risk issues and pollution. It is not located within a Phosphorus Sensitive Catchment Area and can be delivered early in the plan period to contribute towards the resilience of the RLDP's housing trajectory. It is considered that if the Council adopted an urban expansion or village focus approach, given the site is sustainably located and likely to accord with the parameters and objectives to be set within either approach, allocation of this site would therefore contribute to the soundness of the plan through assisting with its effectiveness.

The Council also propose a 'hybrid' spatial option to accommodate future growth. This would include a mix of previously developed land, sites on the edge of urban boundary and sites at surrounding existing villages. This approach is generally more supported over the other spatial options as it provides greater flexibility for allocating the right sites in the right locations to deliver development that addresses local and regional need.

Overall, we encourage the Council to ensure that sites allocated for residential use are assessed on a site by site basis. Our client's site is sustainably located, deliverable and considered worthy of allocation in the emerging RLDP. The site is located adjacent to existing development and meets the principles of 'facilitating developments which are sited in the right locations', as advocated by Planning Policy Wales (PPW) (paragraph 4.1.10).

Evidence Base

<p>The LDP Demographics Report states that when considering growth outcomes, it is important to note that they have been developed during a period of unprecedented social and economic upheaval caused by Brexit and the COVID-19 pandemic, the full impacts of which are not currently fully understood. Alongside these factors, the full detailed results of the 2021 Census are expected in late 2022 / early 2023 which will provide an important update to the demographic evidence base for all local authorities. Once this is available, the report recommends that NCC should consider a range of demographic scenarios and updated assumptions informed by more accurate projections. Therefore, depending on when the next stage RLDP is published, it is expected that the Council will take into consideration any updates to population and growth predications, and as such, we reserve the right to comment further on any updated figures, once made available.</p>	<p>This assessment was produced for the purpose of the Growth and Spatial Options consultation, however the Integrated Sustainability Appraisal (ISA) assesses these in more detail. Updated evidence will be considered as this emerges over the course of the RLDP process.</p>
<p>Summary</p>	
<p>In summary, we broadly support the growth and spatial options proposed by the Council. We encourage the Council to adopt an approach that allocates the right sites in the right locations as advocated by PPW which can demonstrate that they are suitable, deliverable, and sustainable whilst also positively contributing towards the Council's housing delivery targets and placemaking principles.</p>	<p>Noted</p>

GSO 039 - Woodland Amenities (Rogerstone) Ltd - 00720

Question / Response	Officer Response
<p>We are writing on behalf of Woodland Amenities (Rogerstone) Limited. The company owns an area of approximately 10 acres of land at X and are currently working with adjoining landowners, Mr Richard Herbert, Gwyllt Ltd and Mr David and Mr Michael Vaughan on a scheme for the comprehensive area. Our site was submitted as part of a comprehensive proposal at the initial call for sites but it was not possible to provide additional information in 2021 (due to the resignation of the two directors of the company and the death of the chairman). As a result, a smaller area was submitted by Mr Herbert for his land independently. However, we can confirm that the whole of the original site is now available for consideration in the RDLP, comprising land belonging to R Herbert, Woodland Amenities Limited, D & M Vaughan and Gwyllt Limited.</p> <p>In this regard, Woodland Amenities (Rogerstone) Ltd are supportive of appropriate levels of growth in sustainable locations at Rogerstone in particular where there is a metro train station within a few minutes walk, such as is the case in respect of our site. Indeed, we believe that such sustainable locations should be a focus for new development across the City.</p> <p>We will of course submit more information in support of our site in due course along with other landowners and at the appropriate stage. However, given the suitability of the site and its high level of sustainability, we wanted to draw its availability to your attention and would be happy to have an early meeting with you if you would like to discuss the proposals in more detail.</p>	<p>Candidate Site assessments are being carried out as part of a separate process. The results of the Stage 1 assessment can be found in the Candidate Site's Register. Stage 2 of the assessment will be published as part of the Preferred Strategy consultation. The Preferred Strategy consultation provides a further opportunity to submit additional information/ further sites.</p>

GSO 041 - Royal Society For The Protection Of Birds - 00670 Growth Options

Question / Response	Officer Response
<p>GROWTH OPTIONS: Growth Scenarios - 1. Are there any scenarios that have been discounted which should be considered further, and why? 2. Which of the options do you feel is the most appropriate, and why? Assessment of Growth Options Against RLDP Objectives - 3. Are there any other matters that should be taken account of when assessing these scenarios and identifying a Preferred Strategy?</p>	
<p>1, 2 & 3 RSPB Cymru has no particular comments on the Growth Scenarios outlined, but would strongly advocate that the level of growth should be determined in line with the environmental capacity of the plan area to accommodate the growth i.e. the level of growth should be based on an assessment as to the level that can be sustained without unacceptable harm to the natural environment and biodiversity.</p>	<p>Noted</p>
<p>EMPLOYMENT LAND OPTIONS: Recommendation One – 4. Is this requirement appropriate for Newport? Should it be different and if so, why? Recommendation Two – 5. Should some sites be removed from the employment supply? Why? 6. Should alternative land uses be considered for some sites? Please provide examples of such uses and your rationale for this. 7. Should alternative land uses be considered for some sites? Please provide examples of such uses and your rationale for this.</p>	
<p>4, 5,6 & 7 RSPB Cymru has no specific comments on the level of employment growth nor on most of the proposed sites. We note there is still 16 ha of land available at the Gwent Europark site and one of the options with the remaining hectares is to intensify the use of the site. We would be concerned that proper consideration is given in this scenario to the need to conserve and enhance the SSSI and other nature conservation features of the Gwent Levels and whether intensification of uses here is appropriate.</p>	<p>Noted</p>
<p>SPATIAL OPTIONS: 8. Which of these options do you feel is the most appropriate, and why? 9. Are there any other spatial distributions that should considered, and if so, why? 10. Are there any other matters that should be given consideration when assessing these?</p>	
<p>8, 9 & 10 RSPB Cymru object to the Village Focus spatial option. We do not consider it is sustainable to have the high amount of green field development this option would entail. This option would use up valuable countryside and negatively affect the biodiversity it</p>	<p>Noted. The Spatial Option taken forward is discussed in detail in the Preferred Strategy Cabinet Paper, the Preferred Strategy Consultation Paper and associated background papers.</p>

<p>supports. Existing levels of village services could not sustain this scenario and it would increase dependency on the car. This is contrary to the guiding principles of PPW.</p> <p>We object to this option as it indicates the potential for expansion of the existing villages on the Gwent Levels and this would have a detrimental effect on the areas nationally protected characteristics.</p> <p>We would support the continuation of the PDL led approach which has been operating and delivering for the Newport area in the current LDP. This represents the most sustainable use of land and will serve to help protect the designated areas of the Gwent Levels into the future.</p>	
<p>EVIDENCE BASE:</p> <p>11. Are there any other pieces of evidence that you believe should inform the development of the preferred growth and spatial options strategies?</p> <p>12. Are there any other comments you'd like to make regarding anything within this consultation document? Do you agree with the Objectives for the RLDP? If not, how and why do you think they should be changed?</p>	
<p>The Gwent Levels is home to a rich assemblage of wildlife including one of the best assemblages of aquatic invertebrates in the country due to the extensive system of grips, ditches, reens and main rivers criss-crossing it, creating specific environmental conditions. The area hosts a number of European and UK protected species such as dormice, otter and water vole. It is home to a wide variety of birds, particularly important wetland species, such as curlews, avocet and lapwing. The areas of salt march habitat are important for species such as sea lamprey and eel. In recent times several bird species have returned to breed on the Levels after many years, including the bittern.</p> <p>Whilst the RSPB acknowledges the importance of alternative and renewable energy forms, the recent proliferation of applications for solar farms on the Levels is very concerning. Renewable energy development should not be at the expense of important habitat. A balance needs to be found. We note the RLDP the draft Vision and Objectives supports the increasing of renewable energy development and we also note in the current adopted LDP, Policy CE10, that renewable energy proposals will be considered favourably subject to their being no overriding environmental and amenity considerations. We would urge that this is policy is pulled through into the RLDP. We would advocate that further evidence by way of a technical capacity study for solar farms is undertaken to support the evidence base behind this policy. The study should consider the environmental effects of solar farm development against the benefits, the capacity of the area to accommodate this type of development, and the cumulate effects on the area of such development.</p>	<p>Noted As part of this process the LDP team will continue to work with partners, during the preparation of the replacement LDP to ensure any amendments to policy reflect the opportunities identified.</p>

GSO 042 - Newport Golf Club - 00622

Question / Response	Officer Response
<p>GROWTH OPTIONS:</p> <p>Growth Scenarios -</p> <p>1. Are there any scenarios that have been discounted which should be considered further, and why?</p>	

<p>2. Which of the options do you feel is the most appropriate, and why? Assessment of Growth Options Against RLDP Objectives -</p> <p>3. Are there any other matters that should be taken account of when assessing these scenarios and identifying a Preferred Strategy?</p>	
<p>1. There are no scenarios that have been discounted that should be considered further.</p> <p>2. The higher housing growth scenarios published in the growth and spatial options paper accurately reflect that the RLDP has to conform with the Future Wales' spatial strategy. The RLDP should recognise the National Growth Area as the focus for strategic economic and housing growth; essential services and facilities; advanced manufacturing; transport and digital infrastructure.</p> <p>Option 1 (Dwelling-led SYR) is the most appropriate of the growth scenarios to fulfil Future Wales. The Welsh Government is determined to see development and growth in Newport, allowing the city to fulfil its potential as a second focal point for the region. Highly skilled employment opportunities in the transport and digital communications sectors should be catalysts for further economic investments. Option 1 proposes the highest amount of dwellings across the local authority. This is essential to enhance Newport's economic role. The Dwelling-led 5YR scenario has a higher but realistic population change than Option 2 WG-2018-HIGHPOP. This is the step change necessary to achieve the National Plan. Option 1 is the only option with housing supply above the current LDP strategy, therefore, reflecting Newport's focus for growth role established by the Future Wales National Plan 2040.</p> <p>Option 1 will overall bring a neutral contribution to the RLDP objectives; population and communities, health and wellbeing, equality, diversion and inclusion and transport and movement. The risk of not achieving a step change for the City and delivery of growth as envisaged in Future Wales should be a matter for consideration when assessing the scenarios. To de- risk the plan the Preferred Strategy should be based upon a robust assessment of the capacity to deliver Option 1. Delivery and viability should be embedded in the next stages of the candidate site process. An adequate flexibility allowance should be applied to de- risk the plan.</p> <p>The preferred strategy should be based on an objective assessment of the role and function of places within Newport in line with the search sequence and National Sustainable Placemaking Outcomes, as set out in PPW. This will create inclusive, connected, adaptable and accessible communities that are cohesive and ensure Newport's potential is realised.</p>	<p>Noted. The Growth Option taken forward is discussed in detail in the Preferred Strategy Cabinet Paper, the Preferred Strategy Consultation Paper and associated Background Papers.</p>
<p>EMPLOYMENT LAND OPTIONS: Recommendation One -</p> <p>4. Is this requirement appropriate for Newport?</p> <p>5. Should it be different and if so, why?</p> <p>Recommendation Two -</p> <p>6. Should some sites be removed from the employment supply? Why?</p> <p>7. Should alternative land uses be considered for some sites? Please provide examples of such uses and your rationale for this</p>	

<p>4. Recommendation 1 is the minimum requirement to fulfil the expectations of Future Wales for Newport to be the focus for strategic economic growth; essential services and facilities; advanced manufacturing; transport and digital infrastructure.</p> <p>5. Yes, it should probably be different. If the supply to match the requirement is to include the sites identified in the ELR the requirement should be higher.</p> <p>Excluding land East of the Queensway the supply amounts to just over 90 hectares. However, just over 40 hectares is ring fenced for the expansion of Eastman (Solutia). It cannot be considered as readily available to meet the broader employment land requirement to fulfil the growth strategy. Furthermore, the ELR assesses the Accessibility, Environmental Factors and Market Attractiveness of nine sites (includes East of Queensway). Three sites are considered to score highly, amounting to just under 48 hectares.</p> <p>The requirement should be for 77 hectares of readily available, accessible, and attractive employment land. Given a site is ring fenced for Eastman (Solutia) the requirement should be for 117 hectares.</p> <p>6. Given the need to fulfil the local and sub regional (CCR) employment sites, other than land East of Queensway, should not be removed from the employment land supply.</p> <p>7. TAN 23: Economic Development and PPW state that an existing employment site should only be released for other uses if other priorities, such as housing need overrides more narrowly focused economic considerations. The economic considerations are of national significance as per the growth strategy (Future Wales).</p>	<p>Noted. The Growth Option taken forward is discussed in detail in the Preferred Strategy Cabinet Paper, the Preferred Strategy Consultation Paper and associated Background Papers.</p>
<p>SPATIAL OPTIONS:</p> <p>9. Which of these options do you feel is the most appropriate, and why?</p> <p>10. Are there any other spatial distributions that should be considered, and if so, why?</p> <p>11. Are there any other matters that should be given consideration when assessing these?</p>	
<p>8. With regard to spatial options, a hybrid approach is favoured with a mixture of previously developed land, sites on the edge of the urban boundary and sites at surrounding existing villages. Where there is a need for sites and there is no previously developed land or underutilised sites, consideration can be given to suitable and sustainable greenfield sites within or on the edge of settlements. Available land at Newport Golf Club is immediately adjacent to the existing urban area. A balance of previously developed land, sites on the edge of the urban boundary and sites at surrounding existing villages will ensure a range of locations and size of sites. A range of sites de risks the delivery of the RLDP.</p> <p>The hybrid approach scores highly against the RLDP objectives for Economy and Employment, health and wellbeing and biodiversity and geodiversity. Under the hybrid approach or urban expansion option, land at Newport Golf Club could form a sustainable extension to the existing urban area. Taking into account the characteristics of the sites circa 100 dwellings could be accommodated.</p>	<p>Noted. The Spatial Option taken forward is discussed in detail in the Preferred Strategy Cabinet Paper, the Preferred Strategy Consultation Paper and associated background papers.</p> <p>Candidate Site assessments are being carried out as part of a separate process. The results of the Stage 1 assessment can be found in the Candidate Site's Register. Stage 2 of the assessment will be published as part of the Preferred Strategy consultation.</p>

<p>Rogerstone is a well-established location within the existing urban area. There is access to existing services and facilities within the area including schools, convenience retail, community buildings, active travel routes, bus and train services both providing direct links to the city centre. Development at West Newport is well placed to support the ongoing regeneration of the city centre.</p> <p>PPW is clear due to their strategic nature Green Belts will have significance beyond a single local authority and they should only be proposed as part of either a Joint LDP, an SDP or Future Wales. The green belt needs to be balanced with placemaking potential and achieving the growth strategy as per Future Wales. The national plan envisages strategic growth should be focused in and immediately adjoining Newport itself.</p> <p>9. The four spatial distributions provided cover the full range of options from urban to rural land use for development, with the addition of a mixture of both.</p> <p>10. The hybrid option scores favourably as per the assessment of spatial options. To de risk the delivery of the plan as per the LDP Manual 3 a further matter for consideration is the delivery risk associated with each of the spatial options. The hybrid option is low risk. Furthermore, development at Rogerstone has excellent linkages to the city centre.</p>	
<p>EVIDENCE BASE:</p> <p>11. Are there any other pieces of evidence that you believe should inform the development of the preferred growth and spatial options strategies?</p> <p>12. Are there any other comments you'd like to make regarding anything within this Consultation document? Do you agree with the Objectives for the RLDP? If not, how and why do you think they should be changed?</p>	
<p>11. The current evidence base used to inform the development of the preferred growth and spatial options strategies is sufficient and critically incapsulates Newport as a growth in National planning policy.</p> <p>12. It is important that the RLDP takes a pragmatic approach and provides a good balance between housing and employment growth opportunity. There needs to be a strong focus on those identified areas for growth in the paper. A good range of different house types and tenures in a range of locations should be supported through the RLDP, taking advantage of available land on the edge of Newport to help to deliver an appropriate scale of growth for the City.</p> <p>NGC has hosted numerous national and international events through the years. On an annual basis we host the Tucker Trophy which attracts some of the finest golfing talents around the UK and further afield, this event is hosted in conjunction with Wales Golf and is a world amateur ranking event.</p> <p>In 2016 NGC hosted the Welsh Seniors Open Championship, we hosted the Ladies' Home Internationals in 2017 and in 2018 we hosted the Girls and Boys Welsh Championship.</p> <p>More recently we hosted the 2021 Welsh Ladies' Amateur Open and are due to host both the men's and ladies amateur open this summer.</p> <p>These events to name a few are a great asset to the Welsh golfing community and in addition to the wider Newport economic standing with most if not all competitors using local hotels and restaurants during their stay.</p>	<p>Noted</p>

Other Comments	
If land at Newport Golf Club is included in the Deposit Plan a developer will be appointed to support the allocation of the site and deliver the homes as soon as possible. The Golf Club needs to refurbish or redevelop the clubhouse and the funds raised are intended to enable the redevelopment.	Noted. The Deposit Plan will include a review of the urban and village boundaries.

GSO 043 - National Gas Transmission - 00011 Other Comments

Question / Response	Officer Response
<p>National Gas Transmission has appointed Avison Young to review and respond to local planning authority Development Plan Document consultations on its behalf. We are instructed by our client to submit the following representation with regard to the current consultation on the above document.</p> <p><u>About National Gas Transmission</u> National Gas Transmission owns and operates the high-pressure gas transmission system across the UK. In the UK, gas leaves the transmission system and enters the UK's four gas distribution networks where pressure is reduced for public use.</p> <p><u>Utilities Design Guidance</u> The increasing pressure for development is leading to more development sites being brought forward through the planning process on land that is crossed by National Gas Transmission infrastructure. National Gas Transmission advocates the high standards of design and sustainable development forms promoted through national planning policy and understands that contemporary planning and urban design agenda require a creative approach to new development around high voltage overhead lines, underground gas transmission pipelines, and other National Gas Transmission assets.</p> <p><u>Further Advice</u> National Gas Transmission is happy to provide advice and guidance to the Council concerning their networks.</p> <p>Please see attached information outlining further guidance on development close to National Gas Transmission assets.</p> <p>If we can be of any assistance to you in providing informal comments in confidence during your policy development, please do not hesitate to contact us.</p>	<p>Noted. We look forward to working collaboratively as our respect plans progress.</p>

<p>To help ensure the continued safe operation of existing sites and equipment and to facilitate future infrastructure investment, National Gas Transmission wishes to be involved in the preparation, alteration and review of plans and strategies which may affect their assets. Please remember to consult National Gas Transmission on any Development Plan Document (DPD) or site- specific proposals that could affect National Gas Transmission's assets.</p>	
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GSO 044 - National Grid Electricity Transmission - 00847

Question / Response	Officer Response					
<p>National Grid Electricity Transmission has appointed Avison Young to review and respond to local planning authority Development Plan Document consultations on its behalf. We are instructed by our client to submit the following representation with regard to the current consultation on the above document.</p> <p><u>About National Grid Electricity Transmission</u></p> <p>National Grid Electricity Transmission plc (NGET) owns and maintains the electricity transmission system in England and Wales. The energy is then distributed to the electricity distribution network operators, so can reach homes and businesses.</p> <p>National Grid no longer owns or operates the high-pressure gas transmission system across the UK. This is the responsibility of National Gas Transmission, which is a separate entity and must be consulted independently.</p> <p>National Grid Ventures (NGV) develop, operate and invest in energy projects, technologies, and partnerships to help accelerate the development of a clean energy future for consumers across the UK, Europe and the United States. NGV is separate from National Grid's core regulated businesses. Please also consult with NGV separately from NGET.</p> <p><u>NGET assets within the Plan area</u></p> <p>Following a review of the above Development Plan Document, we have identified one or more NGET assets within the Plan area. Details of NGET assets are provided below.</p>	<p>Noted. We look forward to working collaboratively as our respect plans progress.</p>					
<table border="1"> <thead> <tr> <th data-bbox="91 1085 1377 1125">Asset Description</th> </tr> </thead> <tbody> <tr> <td data-bbox="91 1125 1377 1197">4YX ROUTE TWR (001 - 075): 400Kv Overhead Transmission Line route: CILFYNYDD - SEABANK - WHITSON Electrical Substation: IMPERIAL PARK 400KV</td> </tr> <tr> <td data-bbox="91 1197 1377 1268">400Kv Underground Cable route: IMPERIAL PARK - ST BRIDES SGT1B 400Kv Underground Cable route: IMPERIAL PARK - ST BRIDES SGT2B</td> </tr> <tr> <td data-bbox="91 1268 1377 1380">4YX ROUTE TWR (075 - 105): 400Kv Overhead Transmission Line route: CILFYNYDD - SEABANK - WHITSON XM ROUTE: 275Kv Overhead Transmission Line route: CARDIFF EAST - USKMOUTH - WHITSON</td> </tr> <tr> <td data-bbox="91 1380 1377 1417">Electrical Substation: WHITSON 275KV</td> </tr> </tbody> </table>	Asset Description	4YX ROUTE TWR (001 - 075): 400Kv Overhead Transmission Line route: CILFYNYDD - SEABANK - WHITSON Electrical Substation: IMPERIAL PARK 400KV	400Kv Underground Cable route: IMPERIAL PARK - ST BRIDES SGT1B 400Kv Underground Cable route: IMPERIAL PARK - ST BRIDES SGT2B	4YX ROUTE TWR (075 - 105): 400Kv Overhead Transmission Line route: CILFYNYDD - SEABANK - WHITSON XM ROUTE: 275Kv Overhead Transmission Line route: CARDIFF EAST - USKMOUTH - WHITSON	Electrical Substation: WHITSON 275KV	
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4YX ROUTE TWR (105 - 105A): 400Kv Overhead Transmission Line route: CILFYNYDD - SEABANK - WHITSON 33Kv Underground Cable route: LLANWERN BSC 33KV S/S
SD ROUTE: 33Kv Overhead Transmission Line route: LLANWERN - WHITSON SGT1 SE ROUTE: 33Kv Overhead Transmission Line route: LLANWERN - WHITSON SGT2
4YX ROUTE TWR (105 - 158): 400Kv Overhead Transmission Line route: CILFYNYDD - SEABANK - WHITSON XL ROUTE: 275Kv Overhead Transmission Line route: IRON ACTON - WHITSON 1
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WG ROUTE: 275Kv Overhead Transmission Line route: TREMORFA - USKMOUTH - WHITSON Electrical Substation: USKMOUTH 275KV AIS
Electrical Substation: USKMOUTH 132KV
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XM ROUTE: 275Kv Overhead Transmission Line route: TREMORFA - USKMOUTH - WHITSON XR ROUTE: 275Kv Overhead Transmission Line route: USKMOUTH - WHITSON 1
XR ROUTE: 275Kv Overhead Transmission Line route: USKMOUTH - WHITSON 2

The plan showing details and locations of NGET's assets is attached to this letter. Please note that this plan is illustrative only. Please also see attached information outlining further guidance on development close to NGET assets.

Utilities Design Guidance

The increasing pressure for development is leading to more development sites being brought forward through the planning process on land that is crossed by NGET.

NGET advocates the high standards of design and sustainable development forms promoted through national planning policy and understands that contemporary planning and urban design agenda require a creative approach to new development around high voltage overhead lines and other NGET assets.

Further Advice

NGET is happy to provide advice and guidance to the Council concerning their networks. Please see attached information outlining further guidance on development close to National Grid assets.

If we can be of any assistance to you in providing informal comments in confidence during your policy development, please do not hesitate to contact us.

To help ensure the continued safe operation of existing sites and equipment and to facilitate future infrastructure investment, NGET wishes to be involved in the preparation, alteration and review of plans and strategies which may affect their assets.

Question / Response	Officer Response
<p>Thank you for the opportunity to take part in this consultation, as the Council prepares its new Local Development Plan (LDP). We are glad to see references in the consultation document to the new LDP's objective, 'Equality, Diversity and Inclusion', about creating positive places "where Newport's culture, including the Welsh language, is valued and promoted".</p> <p>The Council should ensure that the new LDP is clear about how it will promote the Welsh language. We would like to draw your attention to a number of considerations regarding the Welsh language, as you work on the plan.</p> <p><u>Legislation and policy</u></p> <p>The Council should consider the following legislation and policies and how the LDP can promote the Welsh language in the field of planning:</p> <ul style="list-style-type: none"> - Welsh Language (Wales) Measure 2011 -Planning (Wales) Act 2015 -Well-being of Future Generations (Wales) Act 2015 -Technical Advice Note (TAN) 20: Planning and the Welsh Language (2017) -Cymraeg 2050: A million Welsh speakers (2017) -Planning Policy Wales (2021) -Future Wales: The National Plan 2040 (2021) <p><u>Welsh language standards</u></p> <p>The Welsh Language Measure gives official status to the Welsh language in Wales and establishes the principle that the Welsh language should be treated no less favourably than the English language. The Measure created the Welsh language standards, which are used by the Commissioner to impose duties on organisations to use the Welsh language. We would like to draw your attention to the policy making standards, which place a duty on organisations to consider the effect of policy on the Welsh language. When preparing the new LDP, consideration should be given to the Commissioner's advice document, Policy Making Standards: Creating opportunities for persons to use the Welsh language and treating the Welsh language no less favourably than the English language.</p> <p>Another category of standards are the promotion standards, which place a duty on local authorities to produce and publish a 5-year strategy which explains how they intend to promote the Welsh language and facilitate its use more widely in their areas. The Commissioner has published two advice documents regarding this, Standards relating to promoting the Welsh language - 5-year strategies: a best practice guide for county and county borough councils and National Park authorities and Promotion standards: assessing the achievement of the 5-year strategies - Effective practice guidance document.</p> <p><u>The Council's strategies</u></p>	<p>Noted As part of this process the LDP team will continue to work with partners, during the preparation of the replacement LDP to ensure any amendments to policy reflect the opportunities identified.</p>

<p>The Council should consider its Welsh Language 5 Year Promotional Strategy for 2022- 2027 which it produced in line with the promotion standards placed upon it. It should also consider its Welsh in Education Strategic Plan (WESP) for 2022-2032. The new LDP should further the objectives of the Welsh Language Promotional Strategy and the WESP. In addition, the Council should explain how the LDP will contribute to meeting the strategy's target for increasing the number of Welsh speakers in the area.</p> <p><u>Conclusion</u></p> <p>In summary, consideration should be given to the legislation and policies listed above and the policy making standards and promotion standards placed on the Council, when drawing up the new LDP. The new LDP should state clearly how it will support the Welsh language and further the aims of the Welsh Language Promotional Strategy and the WESP. In addition, we ask the Council to ensure that it consults with local forums and stakeholders who are involved with the Welsh language, when preparing the LDP.</p>	
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GSO 046 - Natural Resources Wales - 00004

Question / Response	Officer Response
<p>We understand this is an informal consultation to inform the preferred strategy. As part of our role we aim to provide an indicative view on environmental issues we believe need to be considered as part of the submission.</p> <p>The 'Growth and Spatial Options' paper dated January 2023 presents a series of high-level growth and spatial options as an indication of how growth could be distributed across Newport. These are presented by six growth options which are assessed against current RLDP objectives.</p> <p>We note that the growth and spatial options appear to focus on delivery of housing and employment land as key drivers. We would encourage your Authority to consider growth in terms of Welsh Government's commitment to a Well-Being Economy. We recommend options be assessed against how they contribute to key challenges such as those identified in Future Wales, i.e. the climate and nature emergencies, against the Well-being of Future Generations goals, which provide a framework for encouraging inclusive growth, and the SMNR aim of a regenerative economy. (SONARR 2020). We would expect that these matters are given appropriate weighting as part of the Integrated Sustainability Appraisal (ISA), to demonstrate how the environmental, social and economic effects of the RLDP have been given due consideration.</p> <p>Notwithstanding the potential outcomes of the Integrated Sustainability Appraisal (ISA), we have a preference for options which would avoid negative impacts upon RLDP objectives relating to; Natural Resources, Biodiversity and Geodiversity, Landscape, Climate Change, Transport and Movement. These objectives should be given appropriate consideration and include details on safeguarding, maintaining and enhancement within the ISA.</p>	<p>Noted. This assessment was produced for the purpose of the Growth and Spatial Options consultation, however the Integrated Sustainability Appraisal (ISA) assesses these in more detail.</p>

<p>We note reference in the assessment of spatial options (Appendix B) to mitigation impacts on the environment. We also note the emphasis on a stepwise approach in Planning Policy Wales (Chapter 6), with "avoiding" impacts being the first step, and mitigation being the last resort. We recommend careful consideration of how best to avoid environmental impacts when deciding upon the preferred growth and spatial options.</p> <p>In particular we would expect each growth option to have regard for the following topics:</p>	
<p><u>Flood Risk</u> As you are aware a large area of Newport is at risk of tidal and fluvial flooding due to its coastal and riverside location. A Strategic Flood Consequence Assessment (SFCA) should be undertaken and inform any growth area, taking into account any current and future planned flood defences. We advise that any new proposed development will have to have regard to policy including TAN15 and any forthcoming replacements. We advise you to consider how any changes may affect the proposed growth areas. In addition, regard should be given to any area that could have an impact on watercourses (reens and ditches) within internal Drainage Board (IDB) which are maintained and managed by NRW to ensure water levels and reduce flood risk.</p> <p><u>Protected Species</u> We understand the current proposals are still high-level and therefore specific details of any species present are currently unknown. However, regard should be given to both European Protected Species and Nationally Protected Species at all proposed locations. We would be happy to provide further observations at the candidate site stage and would be happy to collaborate with your internal ecologist in the early stages in terms of impact to biodiversity on any preferred growth option.</p> <p><u>Protected Sites</u> We note that Newport has a series of protected sites most notably the River Usk Special Area of Conservation (SAC), the Severn Estuary Special Protection Area (SPA) and Ramsar site. Any proposals that have the potential to impact these sites should be subject to a Habitat Regulations Assessment (HRA). In addition, we note the Gwent Levels Sites of Special Scientific Interest (SSSI) network and Newport Wetlands National Nature Reserves (NNR). Any proposed development within or likely to affect these sites should be considered in more detail including potential impact, mitigation, and long-term compensation. Nine National Natural Resources are identified as part of policy 9 in areas where these issues are of national importance. The National Natural Resources indicate broad areas where nationally important ecological networks/green infrastructure exist as a basis for promoting action to protect and enhance biodiversity and improve the resilience of ecosystems and recognising the importance of strategic green infrastructure. The importance of these areas should be given particular attention when identifying development proposals.</p> <p><u>Green Infrastructure</u></p>	<p>Noted, the Preferred Strategy Cabinet Paper, the Preferred Strategy Consultation Paper and associated background papers provide greater detail on this.</p> <p>As part of this process the LDP team will continue to work with partners, during the preparation of the replacement LDP to ensure any amendments to policy reflect the opportunities identified.</p>

<p>We strongly advise that the enhancement of green infrastructure and connected landscapes should be a key factor when considering any growth option. These spaces can provide not just environmental but also social, health and economic benefits. These spaces need to be considered at the early stages of development and should be integrated not just in the wider Newport environment, but regard should be given to cross-boundary linkages as well. We refer you to the South East Wales Statement for more details.</p> <p>Future Wales identifies key challenges, including the climate and nature emergencies, that it is committing to address through leveraging the planning system. SONaRR 2020 and SEAS, also identify the importance of the role spatial planning plays in meeting these challenges. The RLDP has a vital role in responding to the nature and climate emergencies, and we recommend these drivers are given appropriate emphasis when deciding upon the preferred growth and spatial options for the RLDP.</p> <p>We understand the RLDP consultation is in its early stages. When further considering is given to developing possible spatial options, such as strategic sites or new settlements, we would be pleased to work through constraints and opportunities to those options, before you enter into the Plan's Preferred Strategy phase.</p>	
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GSO 047 - St. Modwen Developments Limited - 00648

Question / Response	Officer Response
<p>Naavills is instructed by St. Modwen Developments Limited ("SMDL") to make representations on the Newport Replacement Local Development Plan ("RLDP") Growth and Spatial Options consultation. Enclosed is a Comments Form, however, given the constraints of the form the substance of the comments are presented in this letter.</p> <p>As you will be aware, SMDL is promoting the residential led mixed used regeneration of Glan Llyn which sits on the former Llanwern Steelworks site. This is one of Newport's (and South Wales') key regeneration schemes and lies on a major gateway into South Wales. The site is previously developed (or brownfield) land and occupies a strategic and sustainable position. It is some 243 hectares in size and basically free from environmental designations and constraints. It has, however, been severely affected by its' industrial past.</p> <p>To date, SMDL together with an experienced project team have fostered excellent working relationships with key stakeholders and officers at Newport City Council ("NCC" or "the Council"). All parties recognise Glan Llyn as a clear local and regional priority for regeneration. Both SMDL and NCC also recognise that public sector assistance is needed to deliver the redevelopment of the site. Progress made to date demonstrates that a mixture of uses is possible and it is important that the site continues to feature as part of an allocated site in the RLDP.</p>	<p>Noted</p>

<p>To ensure that it does, the site was promoted as a Candidate Site in August 2021. The submission reinforced the sites' potential for further redevelopment and recommended that Glan Llyn's allocation within the Eastern Expansion Area ("EEA") is maintained in the RLDP as a specific regeneration allocation. Consultation responses were also provided to the Draft Vision, Issues and Objectives document in March 2022 and the Newport Housing Monitoring 2022 in July 2022 in which we emphasised the importance of Glan Llyn as a strategic housing delivery site and noted that, given the strategic nature of the site and the number of residential developers active at any one time, SMDL considered the level of delivery to be robust, and possibly even conservative, given the visibility on likely developer activity across remaining phases for the five year period.</p> <p>This letter has been prepared to provide some further explanation of Glan Llyn's credentials and commentary on the Growth and Spatial Options presented. It starts with the headlines of the current position and background, considers the current policy position before commenting on the growth and spatial options.</p>	
<p><u>Glan Llyn - current position and background</u></p> <p>The Glan Llyn scheme is a very significant regeneration project. The site (and the EEA that it forms part of) is one of the cornerstones of Newport's sustainable growth strategy.</p> <p>Outline planning permission ("OPP") was granted in April 2010 for the whole scheme (ref. 06/0471). The basic proposition is a new neighbourhood of approximately 4,000 new homes in a high quality (and transformed) environment, a local centre and a business park (now known as St. Modwen Park, formerly Celtic Business Park).</p> <p>The site is rectangular in shape with longer sides of approximately 2km and shorter sides of 1km. Its western boundary is formed by Newport Retail Park District Centre, its northern boundary by the Tata and main railway lines and its eastern boundary by the retained Tata Llanwern Steelworks. Its long southern boundary is formed by the Queensway (A4810).</p> <p>Development of the main new residential neighbourhoods falls into two main sub areas. The masterplan for the western area was approved in November 2010 and for the eastern area in February 2020. Applications (for the approval of reserved matters) have since been made and approved for a number of homes together with infrastructure that will serve them which is now in place. In addition, upgrades to the Queensway road to the south of the site has provided a major new link road.</p> <p>The scheme is expected to take about 20 years to complete, by which time it will have created or supported 6,000 jobs. Many of these will have come from the development of the new housing on the site. The project requires long term vision and long term commitment. SMDL has provided both. It is one of the UK's leading regeneration companies, acts as master developer and is responsible for installing the new hard and soft infrastructure and landscaping. SMDL has established a Management Company to maintain the new development. As a completely separate legal entity, St. Modwen Logistics ("SML") is developing most of the business park itself. Individual house builders, housing associations and other</p>	<p>Noted</p>

bodies will be responsible for the delivery of new homes across multiple phases. A new neighbourhood will transform this previously developed site and will include substantial new areas of open space and parkland, two new primary schools and a local centre.

SMDL is committed to the ongoing redevelopment of Glan Llyn development and the adjacent employment site. Reference is made to each of the sites under Policy H1 (Housing Sites), Policy EM1 (Employment Land Allocations), Policy SP10 (House Building Requirement) and Policy SP11 (Eastern Expansion Area) of the current adopted Local Development Plan (January 2015) ("LDP"). These policies capture the potential of the site to create a new residential led mixed use urban extension.

The successful delivery at Glan Llyn to date has been achieved in very difficult market conditions - especially at the beginning of the development process for a very large scheme. Very few other sites have made anything like the progress that Glan Llyn has in these conditions.

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

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

Western and Eastern Sub Areas

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

The Western Sub Area extends to about 60 hectares and comprises the first 1,250 new homes split into five main development areas. As its name suggests, it includes the western part of the site next to the Newport

Retail Park District Centre (Spytty) and close to where the Queensway turns into Queensway Meadows before it meets the A48.

The majority of the Western Sub Area has been delivered including: tackling the ground conditions, structures and services from its industrial past; provision of new roads (including the site's gateway); the development of a number of homes (by various housebuilders) have been completed, or are underway, approved or in the planning pipeline; the first of the two primary schools for the development; the majority of Glan Llyn's green and blue grid of open space have been provided, including a large play and sports space, known as Western Park.

The Eastern Sub Area includes the remainder of the site up to its eastern boundary along to St. Modwen Park. It includes a number of phases for homes, together with the rest of the site's infrastructure and

<p>landscaping elements, including the central and eastern lakes, and Phase 3 of the Avenue Road which connects to the Queensway to the south, and Main Street to the south which connects to the Local Centre. The approval of the Eastern Sub Area masterplan unlocked the remainder of the site and has subsequently seen reserved matters approvals come forward for residential phases and other open space and infrastructure. There are a number of emerging proposals for the remaining phases of the Eastern Sub Area with a variety of housebuilders.</p> <p><u>Local Centre</u></p> <p>A separate sub area masterplan has been approved for the local centre which includes a range of retail, leisure, residential and community facilities to serve the wider Glan Llyn community. The local centre is accessed directly from a signal controlled junction on the Queensway. The infrastructure has been installed and the Marston's Llanwern Bull Pub and Restaurant is now open. Progress is ongoing on the delivery of other aspects to the local centre.</p> <p><u>St. Modwen Park (formerly Celtic Business Park)</u></p> <p>At the eastern end of the site, work on St. Modwen Park is underway by SML. This area also required its own sub area masterplan which was approved in 2015. The main road access has been approved and installed and the first four phases for business units have been approved, with some built and occupied and others expected to be constructed shortly. A Reserved Matters application for Phase 4 was approved in July 2021 and has been built out, delivering a further four business units (Units 4-7). Phase 5 was approved in March 2022, delivering three additional units (Units 8-10). Further Reserved Matters applications are expected to follow during 2023.</p>	
<p><u>Planning policy</u></p> <p><u>Local Development Plan</u></p> <p>The Glan Llyn concept responded to the closure of the former Llanwern Steelworks site. In its Unitary Development Plan ("UDP"), NCC allocated the former 'heavy end' of the steelworks and other land in the vicinity as the EEA. This allocation continues in the adopted LDP. The strategy of the LDP recognises that the EEA is integral to the city's growth strategy, and is underpinned by the allocation and delivery of the Glan Llyn regeneration site.</p> <p>Strategic Policy SP11 relates solely to the Eastern Expansion Area and states that:</p> <p>'The Eastern Expansion Area consists of the former Llanwern Steelworks regeneration site known as Glan Llyn H1(47) and EM1(vii), and housing sites at Llanwern Village H1(3), Hartridge High School H1(19) and Jigsaw Site H1(55). This Eastern Expansion Area is identified as a residential led mixed use, sustainable urban expansion area which will provide a range and choice of housing, employment land and community uses.'</p> <p>As well as supporting wider growth and regeneration ambitions, Glan Llyn helps NCC deliver its housing requirements in a sustainable way. The site provides 25% of the LDPs overall requirement to 2026 (and</p>	Noted

<p>the EEA contributes just under 40%). Glan Llyn will also contribute to longer term housing requirements beyond the current plan period.</p> <p><u>Future Wales - The National Plan 2040 (February 2021)</u></p> <p>Future Wales, through Policy 33 (National Growth Area - Cardiff, Newport and the Valleys), recognises "Cardiff, Newport and the Valleys will be the main focus for growth and investment in the South East region. Strategic and Local Development Plans should recognise the National Growth Area as the focus for strategic economic and housing growth; essential services and facilities; advanced manufacturing; transport and digital infrastructure."</p> <p>The policy continues:</p> <p>"The Welsh Government supports an increased strategic role for Newport as a focus for sustainable, long term growth and investment. The Welsh Government will work with authorities within the region and in England to promote Newport's strategic role and ensure key investment decisions in Wales and England support Newport."</p> <p>It is therefore clear that, at a national level, the strategic and sustainable development of regeneration schemes such as Glan Llyn should have full support.</p> <p><u>Planning Policy Wales (Edition 11, February 2021)</u></p> <p>Planning Policy Wales ("PPW") is specific in recognising a sequence of site allocations that "prioritises the use of previously developed land and existing buildings." The site search and sequence for allocations is therefore clearly established.</p> <p>Paragraph 3.43 notes:</p> <p>In developing their spatial strategy planning authorities must prioritise the use of suitable and sustainable previously developed land and/or underutilised sites for all types of development. When identifying sites in their development plans planning authorities should consider previously developed land and/or underutilised sites located within existing settlements in the first instance with sites on the edge of settlements considered at the next stage."</p> <p>Paragraph 3.55 adds:</p> <p>"Previously developed (also referred to as brownfield) land (see definition overleaf) should, wherever possible, be used in preference to greenfield sites where it is suitable for development."</p>	
<p><u>Comments on Growth and Spatial Options</u></p> <p>As a high level document, the RLDP's Growth and Spatial Options sets out six growth options and four spatial options. The options are informed by the current situation and key issues for the RLDP to address via its Preferred Strategy which is expected to itself be consulted upon in Autumn 2023. SMDL's general observations are set out below.</p> <p><u>Growth Options</u></p> <p>Page 5 of the document identifies "six realistic alternative options, which more align with Newport's national role as an area for growth." These are reproduced in Table 1 below.</p>	<p>Noted. The Growth Option taken forward is discussed in detail in the Preferred Strategy Cabinet Paper, the Preferred Strategy Consultation Paper and associated Background Papers.</p>

Table 1: Growth Options

Growth Option	Dwellings	Jobs
1. Dwelling-led 5YR	12,570	12,945
2. WG-2018- HIGHPOP	9,480	10,695
3. Dwelling-led 10YR	9,570	8,640
4. WG-2018- Principal	7,950	9,405
5. PG-Long Term	8,100	6,720
6. Employment-led OE+D	7,605	5,835

At this point in time, SMDL has limited observations on the overall Growth Options. However, it is helpful to recall that in the Newport Housing Land Availability Schedule 2022, NCC anticipates a total of 1,028 units will be delivered across Glan Llyn over the five year period 2023-27, equating to an average of 206 units per year. This comprises 723 units from Phases 2C, 3A, 3B/3D, 3C/4A and 2D (all of which have the benefit of Reserved Matters approval) and 305 units from future phases during the same five year period. While there has been an easing of market conditions during Q4 2022/Q1 2023, SMDL considers this level of delivery to remain robust given the visibility on likely developer activity across remaining phases for the five year period.

Since the Newport Housing Land Availability Schedule 2022 was consulted on in the summer of 2022, Bellway secured Reserved Matters approval for 212 units at Phase 4H in November 2022. Moreover, St. Modwen Homes has submitted and anticipates progress to be made in respect of securing Reserved Matters approval for Phases 4C and 4B/5D during 2023. Separately, a national housebuilder is expected to progress a Reserved Matters application for Phase 4D during 2023. All the above are expected to contribute to additional delivery rates towards the latter end of the five year period.

SMDL is mindful that the period for the submission of Reserved Matters against the OPP ends in April 2025. It is anticipated that many of these remaining phases (Phases 4G/4E, 5A/5B, 5E1/5E2, 5F and 5G) will secure Reserved Matters approval within this period or, should it be necessary, via an extension of time to the OPP. Under both scenarios, this will translate to further delivery across Glan Llyn during the RLDP plan period (2021-2036).

As a result, it is clear Glan Llyn is capable of making a significant contribution to the delivery of housing over the RLDP plan period which should be fully considered under all Growth Options.

Spatial Options

Appendix B of the document identifies four Spatial Options. These are Previously Developed Land (“PDL”)-led, Urban Expansion, Village Focus and Hybrid Approach. A summary of these options are reproduced in Table 2 below.

Table 2: Spatial Options

Spatial Option	Summary
PDL-led	▪ Continuation of the current spatial strategy.

Noted. The Spatial Option taken forward is discussed in detail in the Preferred Strategy Cabinet Paper, the Preferred Strategy Consultation Paper and associated background papers.

	<ul style="list-style-type: none"> ▪ Focusing growth on previously developed land.
	<ul style="list-style-type: none"> ▪ Requires high density development within the urban boundary
	<ul style="list-style-type: none"> ▪ Explore the reuse of declining employment or industrial land for either housing or new types of employment uses.
	<ul style="list-style-type: none"> ▪ Greenfield land should be avoided as far as possible.
Urban Expansion	<ul style="list-style-type: none"> ▪ Identification of land on the edge of the urban boundary. ▪ Likely to constitute a substantial amount of greenfield growth. ▪ Land-based constraints may restrict the scale of growth.
Village Focus	<ul style="list-style-type: none"> ▪ Direct housing development towards nine defined villages. ▪ Some villages are more constrained than others – less constrained villages would support a high proportion of growth ▪ Likely to result in a high amount of greenfield land consumption. ▪ Unlikely to support a higher scale of growth due to land availability and the level of existing services and facilities
Hybrid Approach	<ul style="list-style-type: none"> ▪ A mix of previously developed land, sites on the edge of the urban boundary and sites at and surrounding existing villages. ▪ Able to draw upon the spatial benefits of the other options. ▪ Difficult to balance growth across this option.

supported by national planning policy and demonstrated by the successful delivery of Glan Llyn to date, SMDL has been supportive of PDL-led approach. National planning policy, through Future Wales and NPW, encourage the prioritisation and re-use of PDL in identifying allocations. Newport's industrial past has provided it with significant opportunities to capitalise and deliver growth via PDL, both in the past and into the future, as demonstrated by Glan Llyn.

It is therefore a concern to SMDL that neither Glan Llyn as a whole, or specifically the 'balance' to its delivery in it's Eastern Sub Area, are identified as a "Broad location for New Housing Growth..." under any of the four Spatial Options as currently set out. Under the PDL-led Option, the land to the east of St. Modwen Park (currently occupied by TATA) is identified, however Glan Llyn itself is not.

SMDL assume this is because it seeks to identify 'new' growth and that Glan Llyn is now considered a commitment towards housing delivery with the benefit of OPP, as defined in the Development Plans Manual (Edition 3, March 2020). However, this is a concern to SMDL who request that Glan Llyn continues to be recognised as a housing allocation for the duration of the delivery of the site, which will continue into the RLDP plan period (2021-2036), in much the same way the current LDP does. Glan Llyn is recognised under the current LDP (as site H1(47)) and at the time of the current LDP's adoption in January 2015 had OPP so in a similar scenario. The current LDP recognises the significance of Glan Llyn (and others) via its allocation and specific Policy SP11 (Eastern Expansion Area). NCC will be aware the period for the submission of Reserved Matters against the OPP ends in April 2025 and, while there are an

<p>increasing number of phases with Reserved Matters approval, a number of the phases are still to secure such. For this reason, SMDL consider it important the RLDP continues to expressly recognise and allocate Glan Llyn and recognise its importance via a regeneration policy given its ability to continue to make a significant contribution towards housing delivery over the plan period 2021-2036.</p>	
<p><u>Conclusion</u> As stated at the beginning of this letter, SMDL seeks to reiterate Glan Llyn's importance as a key regeneration site to deliver the objectives of the RLDP under all Growth Options and Spatial Options presented. This reflects the planning position and delivery on site to date and the clear potential of the scheme to continue to provide a residential-led mixed use urban extension on PDL within the RLDP plan period of 2021-2036. The scheme is a major sustainable regeneration initiative and is a true commitment - OPP has been granted, the site is in the hands of SMDL (an active and experienced development company), significant and substantial infrastructure has been installed and development is underway by multiple housebuilders. Glan Llyn continues to both warrant and need clear planning support and should be identified as a clear priority and objective for the RLDP via a specific allocation (in much the same way Policy SP11 (Eastern Expansion Area) performs in the current LDP).</p>	<p>Noted</p>

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SO 048 - Linc Cymru and Melin Homes - 00571

Question / Response	Officer Response
<p>Asbri Planning, on behalf of Linc Cymru and Melin Homes, wish to comment on the Replacement Local Development Plan (LDP) Growth and Spatial Options Paper (January 2023), which was issued for non-statutory consultation on 25th January 2023. The Paper sets out growth and spatial options for the Replacement LDP, together with the implications of each option and the extent to which they will achieve the RLDP objectives - which will inform the Preferred Strategy that will be delivered by the RLDP. This letter has been prepared in the context of land which is being promoted by Joint Site Promoters (Linc Cymru and Melin Homes) at 'Land at Gorelands, Langstone', for which a Candidate Site representation was submitted to the Authority in July 2021.</p>	<p>Noted. Candidate Site assessments are being carried out as part of a separate process. The results of the Stage 1 assessment can be found in the Candidate Site's Register. Stage 2 of the assessment will be published as part of the Preferred Strategy consultation.</p>
<p><u>Consideration of Growth Options</u> Since the adoption of the current LDP (2011-2026) in 2015, the national planning policy context has undergone a number of changes. Of particular importance in terms of implications for the Newport Replacement LDP is the publication of Future Wales: The National Plan 2040 (published 24th February 2021). Future Wales forms the 'National Development Framework for Wales' and is the highest tier of the development plan in Wales. As acknowledged within the Growth and Spatial Options Paper, Future Wales "provides a spatial framework for the provision of new infrastructure/growth and seeks to</p>	<p>Noted. The Growth Option taken forward is discussed in detail in the Preferred Strategy Cabinet Paper, the Preferred Strategy Consultation Paper and associated Background Papers.</p>

manage development and the use of land through the planning system, in line with key national priorities in the public interest". The content of Future Wales is therefore of key importance in developing the Replacement LDP's growth and spatial options.

Newport is identified within Future Wales as a 'National Growth Area'. Policy 33 - National Growth Area - Cardiff, Newport and the Valleys of sets out that "Cardiff, Newport and the Valleys will be the main focus for growth and investment in the South East region". Supporting text to Policy 33 sets out at Page 165 that "The Welsh Government is determined to see development and growth in Newport, allowing the city to fulfil its potential as a second focal point for the region".

In light of the above, it is essential that the growth strategy of the Replacement LDP aligns with Newport's national role as an area for growth.

The Growth and Spatial Options Paper (January 2023) outlines and assesses six potential growth options. The current/adopted LDP growth strategy is based upon the delivery of 690 dwellings per annum. In light of Newport's National Growth Area status, the level of growth proposed for the replacement LDP cannot fall below the current LDP growth. If a lower growth option is proposed than that on which the current plan is based, the replacement plan would not reflect Newport's nationally important role (as identified by Welsh Government in the highest tier of the Development Plan).

Any growth option which is set at level below 690 dwellings per annum would effectively result in a plan which fails to meet the tests of soundness - in particular, Soundness Test 1 would not be met as the replacement LDP would not be consistent with other plans (i.e. Future Wales).

The only growth option presented within the Growth and Spatial Options Paper which delivers a level of housing growth above the current LDP strategy of 690 dwelling per annum is 'Option 1 - Dwelling-Led Growth', which is based on a growth level of 838 dwellings per annum. As highlighted within the table below, all other growth options (options 2-6) are based upon a growth level which falls below the current/adopted LDP.

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Option	Description	Dwellings		Jobs	
		Per annum	Overall scale	Per annum	Overall scale
1. Dwelling-led 5YR	Models the population impact of an average annual dwelling growth of +838 dwellings per annum (dpa), based on a 5-year history of pre-COVID-19 housing completions in Newport (2015/16–2019/20).	838	12,570	863	12,945
2. WG-2018-HIGHPOP	Replicates the Welsh Government 2018-based high population projection, rebased to the 2021 Census population figure and incorporating high fertility, mortality and migration assumptions.	632	9,480	713	10,695
3. Dwelling-led 10YR	Models the population impact of an average annual dwelling growth of +638 dpa, based on a 10-year history of pre-COVID-19 housing completions in Newport (2010/11–2019/20).	638	9,570	576	8,640
4. WG-2018-Principal	Replicates the Welsh Government 2018-based Principal population projection, using historical population data for 2001–2018.	530	7,950	627	9,405
5. PG-Long Term	Uses an ONS 2020 MYE base year and calibrates its migration assumptions from a 19-year historical period (2001/02–2019/20).	540	8,100	448	6,720
6. Employment-led OE+DBI Uplift	Models the population impact of an average annual employment growth of +389 per year over the plan period, with an uplift applied to the OE economic forecast, based on the Cardiff Capital Region (CCR) city deal direct and indirect employment projections.	507	7,605	389	5,835

As such, in the context of the Newport's national role as an area for growth, Option 1 is supported as the only appropriate growth option to allow for its growth area status to be delivered. Option 1 is a high growth option, resulting in an annual requirement for 838 new homes and 863 new jobs - the overall requirement would equate to 12,570 new homes and 12,945 new jobs over the period 2021-2036 (reflecting Newport's nationally important role identified by Future Wales).

Consideration of Spatial Options

The growth strategy of the current/adopted LDP (2011-2026) has focussed heavily on large brownfield sites in and around Newport. The LDP Review Report (April 2021) sets out that 94% of housing has been delivered on previously developed land since the adoption of the LDP (in 2015). Paragraph 4.14 of the Review Report highlights that "It is not clear whether future levels of growth can be accommodated predominantly on previously developed land over the next plan period".

In light of the above, a need is now identified for suitable greenfield sites given that the majority of brownfield opportunities within the area have been exhausted. In light of the limited availability of remaining suitable brownfield land, it is considered that a spatial distribution option which continues to focus on brownfield sites will fail to meet projected needs across the life of the replacement plan period. The Growth and Spatial Option Paper sets out five spatial distribution options. It is stated that these options "have been derived through an application of national policy principles with relation to prioritising the reuse of previously developed land". However, as set out above, the spatial distribution option needs to be considered firmly in the context of previously developed land forming a finite resource (with 94% of all housing in Newport being delivered on brownfield land since the current LDP was adopted).

The first growth option set out within the Growth and Spatial Options paper is based on a "Previously Developed Land (PDL) Led" approach which would "constitute a continuation of the current spatial

Noted. The Spatial Option taken forward is discussed in detail in the Preferred Strategy Cabinet Paper, the Preferred Strategy Consultation Paper and associated background papers.

strategy, focusing growth on previously developed land". It is considered that a PDL-led option is entirely inappropriate for future growth within Newport, requiring high density development within the urban boundary restricted to the reuse of declining employment or industrial land.

Reverting back to the critical importance of ensuring future growth levels reflect the objectives of Future Wales, in recognising Newport's identification as a National Growth Area, a PDL-led option will significantly limit the ability of the plan to fulfil this strategic role if there is a lack of suitable sites.

Furthermore, a large proportion of remaining PDL land is located within areas subject to flood risk - further restricting the ability of PDL land to deliver the level of necessary growth. A particular point, which we would highlight as critical to the delivery of housing is the likely limitation on the variety of housing types that can be delivered by the PDL-led approach, recognising the likely financial viability constraints utilising PDL land within the existing settlement boundaries.

In summary, in light of the above, the "Previously Developed Land (PDL) Led" spatial option is not supported. It is considered that the Replacement LDP, if progressed on this basis, will be fundamentally unsound. Specifically, the plan would fail Soundness Test 3 (Will the plan deliver) - as clearly the plan will be ineffective.

The second spatial option set out within the Growth and Spatial Options paper is an "Urban Expansion" based approach. The paper sets out that "Taking an urban expansion approach would require the identification of land on the edge of the urban boundary. This is likely to constitute a substantial amount of greenfield growth". It is considered that the Replacement plan will need to be underpinned by a spatial option which constitutes greenfield growth to allow for the necessary level of growth to be delivered - as the Growth and Spatial Options paper clearly states "Urban expansion would allow greater capacity to try and meet the levels of regional growth and investment expected as part of Newport's National Growth Area designation". The potential challenges posed by an Urban Expansion strategy are acknowledged, for example with regards to sustainable travel. However, the Replacement LDP should look to greenfield sites which present options to increase the use of sustainable travel options (including sites positioned on the edge of existing settlements such as the Candidate Site at 'Land at Gorelands, Langstone' which, although a greenfield site, is located within a short walk of locally accessible services and facilities and sustainable modes of public transport within Langstone Village).

There a number of benefits associated with the urban expansion approach to growth, which are acknowledged within the Growth and Spatial Options Paper - of particular importance in terms of the delivery of housing within Newport over the replacement LDP period are the following:

- o Sites identified for urban expansion would be likely to have a greater capacity to provide a variety of housing types and compositions to support a balanced and sustainable community, as well as the numbers required to meet national policy.

<p>o Sites identified for urban expansion would be likely to have a greater capacity to provide the social, environmental, cultural and physical infrastructure required to support the needs of these areas, as well as any existing urban areas nearby.</p> <p>o Opportunity to deliver high quality homes to the highest sustainability and construction standards.</p> <p>In summary, the "Urban Expansion" based spatial option is supported, as this presents the only realistic option for meeting the levels of regional growth and investment expected as part of Newport's National Growth Area designation.</p> <p>The third spatial option set out within the Growth and Spatial Options paper is a "Village Focus" based approach, which would look to direct housing development towards nine defined villages (Castleton and Marshfield; St Brides; Bishton; Llanwern; Underwood; Llanvaches; Parc Seymour; Christchurch and Caerleon). This option is not supported as it will not support a higher scale of growth due to land availability, and will not adequately accommodate the levels of regional growth and investment expected as part of Newport's National Growth Area designation. As such, the "Village Focus" based approach is not supported.</p> <p>A final option is presented (the "Hybrid Approach") which represents a mix of previously developed land; sites on the edge of the urban boundary; and sites at and surrounding existing villages. Although this option allows for the key benefits of each spatial option to be exploited, the Hybrid Approach is not supported as it is considered that any strategy which relies to any degree upon previously developed land is unrobust. As the Growth and Spatial Options paper states in assessing the Hybrid Approach "Given PDL land is finite, it may not meaningfully contribute towards meeting the projected needs across the full 15-year life of the plan".</p>	
<p><u>Summary</u></p> <p>Upon reviewing the Growth and Spatial Options Paper (January 2023), it is concluded that the following options are supported:</p> <ul style="list-style-type: none"> o Growth Option: Option 1 - Dwelling-Led 5yr o Spatial Option: 'Urban Expansion' based approach 	Noted

GSO 049 - The Church Commissioners For England - 00639

Question / Response	Officer Response
<p>GROWTH OPTIONS:</p> <p>Growth Scenarios -</p> <p>1. Are there any scenarios that have been discounted which should be considered further, and why?</p> <p>2. Which of the options do you feel is the most appropriate, and why?</p> <p>Assessment of Growth Options Against RLDP Objectives -</p>	

3. Are there any other matters that should be taken account of when assessing these scenarios and identifying a Preferred Strategy?	
<p>On behalf of our client, the Church Commissioners for England (CCE), we enclose representation to the Newport Replacement Local Development Plan (RLDP) Growth and Spatial Options document.</p> <p>CCE is a registered charity that supports the work and mission of the Church of England across the country. Its investment policy is to hold a diverse portfolio of investments across a broad range of asset classes consistent with its ethical guidelines. Its Strategic Land team brings forward land for new housing developments with the aim of delivering new homes and employment opportunities which support and enhance the local community. Many new developments also include new schools, community facilities, new areas of open space, including new country parks, which benefit not only new residents but also neighbouring communities.</p> <p>CCE own land in Newport, to the north of the village of Caerleon, extending to circa 130 hectares. The site was put forward in the Call for Candidate Sites in August 2021, and representations were made to the RLDP Draft Vision, Issues and Objectives document in March 2022.</p>	<p>Noted</p> <p>Candidate Site assessments are being carried out as part of a separate process. The results of the Stage 1 assessment can be found in the Candidate Site's Register. Stage 2 of the assessment will be published as part of the Preferred Strategy consultation.</p>
<p>Future Wales: The National Plan 2040 identifies Newport as a National Growth Area, towards which strategic economic and housing growth should be focused. CCE welcomes the opportunity to work with the Council to achieve the growth necessary to meet the needs of Newport as a National Growth Area and supports in principle the growth options in the consultation document. In particular, CCE considers that the most appropriate option for growth is Option 1, dwelling-led five year. This option results in the highest number of both dwellings and jobs of the six options presented.</p> <p>The Newport City Council LDP Demographics report (September 2022) states that Newport's population increased 9.5% in the ten years between the 2011 to 2021 Census. This growth is significantly higher than the regional (2.9%) and national (1.4%) growth and must be supported by planning for an appropriate number of dwellings and jobs. The report also acknowledges that annual population growth in Newport has been influenced by the rate at which new homes have been built, therefore supporting the dwelling-led approach as the most appropriate option for growth.</p> <p>Option 1 also results in the highest job growth, which is critical to support Newport as a National Growth Area and enhance its economic role in Wales. This would reduce the reliance on outward commuting for work, and new development in rural areas would support jobs in these locations.</p>	<p>Noted. The Growth Option taken forward is discussed in detail in the Preferred Strategy Cabinet Paper, the Preferred Strategy Consultation Paper and associated Background Papers.</p>
<p>CCE's land at Caerleon provides an opportunity to deliver both dwellings and jobs in Newport. The circa 130-hectare site could deliver a new sustainable garden village development, including affordable homes, employment land, social and community infrastructure and a new local centre. The consultation document acknowledges that option 1 would support the RLDP's Economy and Employment, Population and Communities, Health and Well-being, and Equality, Diversity, and Inclusion objectives. The development of a garden village at CCE's land at Caerleon could make a substantial contribution to meeting these objectives, as well as other RLDP objectives.</p>	<p>Candidate Site assessments are being carried out as part of a separate process. The results of the Stage 1 assessment can be found in the Candidate Site's Register. Stage 2 of the assessment will be published as part of the Preferred Strategy consultation.</p>

<p>For example, CCE's land would also support the Transport and Movement and Climate Change objectives. The site is of a scale to be considered a standalone community and residents would be able to meet the majority of day-to-day needs on site. It is, however, also within walking distance of Caerleon and cycling distance of Newport city centre, making it a highly sustainable development location.</p>	
<p>EMPLOYMENT LAND OPTIONS: Recommendation One - 4. Is this requirement appropriate for Newport? 5. Should it be different and if so, why? Recommendation Two - 6. Should some sites be removed from the employment supply? Why? 7. Should alternative land uses be considered for some sites? Please provide examples of such uses and your rationale for this.</p>	
<p>An employment land requirement of 77ha (recommendation one) is generally considered appropriate for Newport, however CCE would emphasise the need to ensure flexibility so that employment land requirements are in line with the growth and spatial options taken forward in the RLDP. Higher scales of employment growth would be appropriate to support Newport as a National Growth Area, and therefore would likely require more employment land to be supported by the plan. This should not be restricted by the RLDP, as it could provide new and enhanced economic opportunities, and attract new skills and businesses to Newport.</p> <p>With regards recommendation two, CCE considers that it may be appropriate to remove some sites from the employment supply to ensure that new employment land comes forward in the most appropriate locations based on the RLDP's new spatial strategy. This will ensure the Economy and Employment objective is met, offering a range of new and improved employment opportunities over the plan period.</p>	<p>Noted. The Growth Option taken forward is discussed in detail in the Preferred Strategy Cabinet Paper, the Preferred Strategy Consultation Paper and associated Background Papers.</p>
<p>SPATIAL OPTIONS: 8. Which of these options do you feel is the most appropriate, and why? 9. Are there any other spatial distributions that should be considered, and if so, why? 10. Are there any other matters that should be given consideration when assessing these?</p>	
<p>CCE considers that the 'hybrid approach', including a mix of sites at and surrounding existing villages, previously developed land, and sites on the edge of the urban boundary, is the most appropriate spatial option for the RLDP. A hybrid approach would allow flexibility and support Newport's strategic designation as a National Growth Area. It will ensure development comes forward in the most sustainable locations including brownfield sites, whilst recognising that greenfield sites can also offer sustainable development opportunities.</p> <p>CCE's land at Caerleon provides an opportunity to develop a sustainable garden village to contribute to growth through a hybrid spatial strategy. It is of a scale to provide a range of housing types and tenures, including affordable housing, as well as the infrastructure required to support the community, including a local centre and employment opportunities. Its location is highly sustainable, with the eastern parts of</p>	<p>Noted. The Spatial Option taken forward is discussed in detail in the Preferred Strategy Cabinet Paper, the Preferred Strategy Consultation Paper and associated background papers.</p>

<p>the site within a 1.3km walk of Caerleon, and the western boundary less than 1km from the built-up area of Newport city centre via an existing direct cycle route, therefore promoting active travel.</p> <p>When assessed against the RLDP objectives, the consultation document states that the hybrid approach is likely to have an adverse impact on the current air quality management areas contrary to policy. CCE agrees that air quality should be a fundamental consideration for the spatial options. Air quality in Caerleon is an issue due to traffic congestion along the one-way system and narrow streets, and therefore Caerleon is particularly suited to any improvements which would help alleviate air quality issues in the area. Vehicular access to CCE's site is anticipated to form a new road between the A4042 and the B4236 which, in addition to providing access to the site, would have wider local benefits by reducing traffic pressure through Malpas and central Caerleon, in turn contributing to improving air quality in the area. CCE's land at Caerleon brings further opportunity to assist in improving air quality in the village as its development could support the opening of a new train station in Caerleon, a key aspiration of the Welsh Government. The size and positioning of the site would increase the demand for local rail services and help in supporting long-term viability of the service. The proposal site could also generate the case for increasing the frequency of current rail services on the route between Cwmbran and Newport Stations (the Welsh Marches Line), supporting the RLDP objectives of increasing the use and provision of sustainable travel options.</p> <p>As part of a hybrid spatial strategy, the Council should consider allocating land for garden villages, such as CCE's land at Caerleon, to ensure suitable, viable and deliverable sites come forward to meet the need for new housing over the plan period.</p>	
<p>EVIDENCE BASE:</p>	
<p>11. Are there any other pieces of evidence that you believe should inform the development of the preferred growth and spatial options strategies?</p>	
<p>12. Are there any other comments you'd like to make regarding anything within this consultation document? Do you agree with the Objectives for the RLDP? If not, how and why do you think they should be changed?</p>	
<p>CE generally supports the objectives identified for the RLDP. Specifically, it strongly supports the Population and Communities objective to deliver high quality homes supported by necessary social, environmental, cultural and physical infrastructure. Development of its land at Caerleon for a garden village could make a substantial contribution to meeting this objective.</p> <p>Whilst CCE generally supports the Transport and Movement objective, in line with our earlier comments on air quality, it is considered that the objective should be bolstered to consider strategic solutions to address air quality issues, including a new rail station in Caerleon which a garden village at CCE's site could help support.</p>	<p>Noted</p>
<p>Other Comments</p>	
<p>CCE's site represents an opportunity to provide a garden village to the north of Caerleon. The provision of housing (a proportion of which will be affordable), the creation of ancillary employment generating</p>	<p>Candidate Site assessments are being carried out as part of a separate process. The results of the Stage 1 assessment can</p>

<p>uses, and the green infrastructure that will be included on site represent significant environmental, social, cultural and economic advantages. The proposals would be well contained due to the existing topography and the natural site boundaries. The site is within a sustainable location with good opportunities for walking and cycling in the local area as well as diverting/extending existing public transport services into the site.</p>	<p>be found in the Candidate Site's Register. Stage 2 of the assessment will be published as part of the Preferred Strategy consultation.</p>
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GSO 050 - Associated British Port - 00435

Question / Response	Officer Response
<p>GROWTH OPTIONS: Growth Scenarios - 1. Are there any scenarios that have been discounted which should be considered further, and why? 2. Which of the options do you feel is the most appropriate, and why? Assessment of Growth Options Against RLDP Objectives - 3. Are there any other matters that should be taken account of when assessing these scenarios and identifying a Preferred Strategy?</p>	
<p>Associated British Ports (ABP) supports the approach that the scale and location of new housing and employment in the Replacement Local Development Plan (RLDP) should reflect Newport's nationally important role as identified in Future Wales: The National Plan for 2040.</p> <p>As part of its draft Vision, Issues and Objectives RLDP consultation, the Council has already recognised the Port of Newport (referred to in adopted policy as Newport Docks) as an important economic asset for the area, playing a long-standing role in the local economy which supports a wide range of port-related businesses, and the jobs that those activities generate - both on site and through its wider supply chain. ABP, as owners of the Docks who are continually looking to improve and expand its facilities in Newport, therefore support the more ambitious approach taken to both housing and job growth set out in Options 1-4.</p> <p>In ABP's view, to provide consistent messaging to the market, both in terms of housing building investment and to potential new businesses coming to the area considering the available labour force, adopting a scale of housing growth closer to the current LDP target of 690 dpa would represent a pragmatic basis for plan making purposes.</p>	<p>Noted</p>
<p>EMPLOYMENT LAND OPTIONS: Recommendation One - 4. Is this requirement appropriate for Newport? 5. Should it be different and if so, why? Recommendation Two - 6. Should some sites be removed from the employment supply? Why? 7. Should alternative land uses be considered for some sites? Please provide examples of such uses and your rationale for this.</p>	

<p>Recommendation One ABP agree that the demand requirement of 77ha over the plan period is appropriate. The inclusion of the additional demand identified in the Regional Employment Study as part of Newport's requirement is welcomed as this reflects the larger than local role that Newport plays in supporting economic activity across the region.</p> <p>Recommendation Two ABP does not have any comment on the specific sites identified within the employment supply but notes that, in line with the approach taken in the adopted LDP, the Newport Docks should continue to be allocated by a complementary employment policy which recognises the contribution it makes to economic activity in Newport.</p> <p>In addition to its existing role of bulk handling, warehousing and storage, the Docks provides unique opportunities by virtue of its deep water access and surrounding hinterland to support green energy transition projects which, as well as proving increasingly important to attracting job-creating business and investment, will assist in the delivering the RLDP's emerging climate change objectives. ABP's recently published sustainability strategy Ready for Tomorrow sets out the extent of our ambitions in this regard; as Wales's premier industrial port, ABP sees Newport as integral in delivering these objectives and looks forward to working closely with the Council's officers to ensure that its aspirations can aligned with those of emerging RLDP.</p>	<p>Noted. The Growth Option taken forward is discussed in detail in the Preferred Strategy Cabinet Paper, the Preferred Strategy Consultation Paper and associated Background Papers.</p>
<p>SPATIAL OPTIONS:</p> <p>10. Which of these options do you feel is the most appropriate, and why?</p> <p>11. Are there any other spatial distributions that should considered, and if so, why?</p> <p>12. Are there any other matters that should be given consideration when assessing these?</p>	
<p>ABP does not have a particular comment on the spatial options set out in the consultation other than to welcome the continued designation of the Docks within the Newport urban area.</p>	<p>Noted</p>
<p>EVIDENCE BASE:</p> <p>11. Are there any other pieces of evidence that you believe should inform the development of the preferred growth and spatial options strategies?</p> <p>12. Are there any other comments you'd like to make regarding anything within this consultation document? Do you agree with the Objectives for the RLDP? If not, how and why do you think they should be changed?</p>	
<p>ABP support the Economy and Employment objective set out in Appendix A of the consultation document, and in line with contents of the previous Vision, Issues and Objectives consultation, we restate the comments made on our behalf that we support the recognition that the Council has given to the economic importance of the Docks.</p> <p>As part of the objective to offer a 'diverse range and choice of new and improved employment activities', the Newport Docks, and ABP's ambitions for them in the transition towards a green economy means that over the RLDP period, has the ability to play a key role in supporting this diversification.</p>	<p>Noted</p>
<p>Other Comments</p>	

<p>ABP is currently in the process of developing a long-term masterplan for the port. We welcome continued engagement with officers as they develop the RLDP so that we can ensure that our emerging aspirations can be best aligned with and mutually reinforcing of the new local plan.</p>	<p>Noted As part of this process the LDP team will continue to work with partners, during the preparation of the replacement LDP to ensure any amendments to policy reflect the opportunities identified.</p>
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GSO 051 - TATA Steel Ltd - 00170

Question / Response	Officer Response
<p>GROWTH OPTIONS: Growth Scenarios - 1. Are there any scenarios that have been discounted which should be considered further, and why? 2. Which of the options do you feel is the most appropriate, and why? Assessment of Growth Options Against RLDP Objectives - 3. Are there any other matters that should be taken account of when assessing these scenarios and identifying a Preferred Strategy?</p>	
<p>1 The growth scenarios which the Council has now discounted should not be subject to further consideration. A majority of the scenarios discounted represent levels of growth significantly below that set out in the adopted LDP. The Growth and Spatial Options Paper correctly concludes that such scenarios fail to reflect Newport's expected role as a focus for growth (as required by Future Wales). Low scale growth options of that nature would therefore fail to conform with national planning policy. We are also supportive of discounting scenarios that are only marginally different and ask the Council to only take forward the higher scale of growth for consideration in the consultation paper.</p> <p>2. Newport forms part of a National Growth Area (along with Cardiff and the Valleys), as identified by Policy 33 of Future Wales. The consultation paper correctly notes that it is incumbent on the Replacement LDP to recognise that the National Growth Area must be a focus for strategic economic and housing growth. Specifically relating to Newport, Policy 33 of Future Wales states that the Welsh Government supports an increased strategic role for Newport as a focus for sustainable, long-term growth and investment.</p> <p>In this context, it is essential that the Replacement LDP takes forward ambitious options for housing and job growth options. This will be critical if Newport is to see a step change in its strategic role in South Wales and beyond. Taking the six growth options put forward, only Option 1 represents a more ambitious level of growth than the adopted LDP (in terms of housing growth at least). Whilst Options 2, 3 and 4 present higher levels of job growth than the adopted LDP, they all propose lower levels of housing growth.</p>	<p>Noted. The Growth Option taken forward is discussed in detail in the Preferred Strategy Cabinet Paper, the Preferred Strategy Consultation Paper and associated Background Papers.</p>

<p>Therefore, it is clear that Option 1 is the most appropriate option presented. This option represents the most ambitious growth scenario for both new homes and jobs. It also provides the greatest opportunity to achieve the strategic economic and housing growth required by Future Wales.</p> <p>3. We have no specific comments to make in respect of Question 3.</p>	
<p>EMPLOYMENT LAND OPTIONS:</p> <p>Recommendation One -</p> <p>4. Is this requirement appropriate for Newport?</p> <p>5. Should it be different and if so, why?</p> <p>Recommendation Two -</p> <p>6. Should some sites be removed from the employment supply? Why?</p> <p>7. Should alternative land uses be considered for some sites? Please provide examples of such uses and your rationale for this.</p>	
<p>4 and 5. We agree with the concerns raised in relation to basing the requirement on the Oxford Economics projections, which appear to underestimate likely growth. The resultant negative need for employment land and low levels of need under 'growth only' scenarios would clearly fail to deliver 'sustainable, long-term growth and investment' for Newport. As a result, Newport would fall short of the strategic role required by Future Wales.</p> <p>It is therefore appropriate for the Council to adopt a more ambitious requirement (as proposed in the consultation paper), which supports a higher forecast need to meet changing sectoral needs. It is also appropriate for the requirement to include a buffer to enable flexibility, which as stated in the Employment Land Review (ELR), will enable choice in the market and fluctuations in growth. The inclusion of an uplift to reflect regional employment demand is also supported.</p> <p>As recognised in the ELR, no forecast method is exact and ideal for all circumstances. It is therefore appropriate and important to build in flexibility to the employment land requirement. It is also important that wider policies in the Replacement LDP provide flexibility to enable agility in responding to future market demand over the plan period.</p> <p>6. We do not wish to comment at this stage on whether individual sites identified within the ELR should be removed from the identified employment supply. We would, however, encourage the Council to consider this further as the plan emerges. Should it be deemed appropriate to remove land from the supply, this should be clearly evidenced through later stages of the plan.</p> <p>It is noted that the ELR indicates that available land at the Eastman/Solutia site is likely to be linked to expansion of the Eastman firm itself. If that is the case, and land is only likely to be available to facilitate the expansion of the existing use, at a minimum reference should be made to this point, and the site is not available for other general employment needs.</p> <p>Whilst not specifically asked by this question, we would ask that a significant area of land (c.157.8 ha) within our client's (Tata Steel) control to the south of Queensway be added, rather than removed from the employment supply. This point is specifically returned to later in this response.</p>	<p>Noted. The Growth Option taken forward is discussed in detail in the Preferred Strategy Cabinet Paper, the Preferred Strategy Consultation Paper and associated Background Papers.</p>

<p>7. We have no specific comments to make in respect of Question 7.</p> <p>SPATIAL OPTIONS:</p> <p>8. Which of these options do you feel is the most appropriate, and why?</p> <p>9. Are there any other spatial distributions that should be considered, and if so, why?</p> <p>10. Are there any other matters that should be given consideration when assessing these?</p> <p><u>8.</u> Our client (Tata Steel) advocates the role of previously developed land (PDL) in the delivery of new growth in Newport, particularly in relation to new employment development. The importance of such sites must be reflected in the spatial distribution of new growth to be set out in later stages of the plan. As previously advocated by our client in response to the 'Draft Vision, Issues and Objectives' consultation, specific sites (i.e. opportunities of significant scale/potential) should be explicitly recognised and supported via specific policies within the LDP. This will provide greater certainty, help to realise the strategic economic growth and investment and support the positive delivery of such sites. Whilst PDL will make a significant contribution across the plan period, in order to deliver the scale of growth required, development will also be needed on the edge of existing urban areas and through the expansion of the most sustainable villages. We therefore support a hybrid approach to spatial distribution.</p> <p>Whilst supporting the general principle of a hybrid approach, the actual spatial distribution will be important and sufficient emphasis must be placed on the potential of PDL first and foremost, whilst directing additional growth to the edge of urban areas and the most sustainable villages.</p> <p>There is a danger that taking forward a solely PDL led approach (and restricting greenfield development) will place undue pressure on the existing supply of employment/industrial land (i.e. by increasing pressure to use employment land for other uses).</p> <p><u>9.</u> We have no specific comments to make in respect of Question 9.</p> <p><u>10.</u> We have no specific comments to make in respect of Question 10.</p> <p>EVIDENCE BASE:</p> <p>11. Are there any other pieces of evidence that you believe should inform the development of the preferred growth and spatial options strategies?</p> <p>12. Are there any other comments you'd like to make regarding anything within this consultation document?</p> <p><u>11.</u> There are no additional pieces of evidence that our client wishes to identify at this stage. We do, however, have concerns with the ELR prepared in support of this paper. This is addressed in more detail below - but in short, the ELR fails to reference a significant area of land owned by our client which is available for employment development within the plan period to the south of Queensway. Whilst this is not an additional piece of evidence per se, our client would like to see the ELR reviewed/updated to reflect Tata's land holdings at Llanwern more accurately - both to the north and south of Queensway.</p> <p><u>12.</u> Our client wishes to make further comments in relation to the ELR and how its findings then translate to the employment land supply set out in the consultation paper.</p>	<p>Noted. The Spatial Option taken forward is discussed in detail in the Preferred Strategy Cabinet Paper, the Preferred Strategy Consultation Paper and associated background papers.</p> <p>Candidate Site assessments are being carried out as part of a separate process. The results of the Stage 1 assessment can be found in the Candidate Site's Register. Stage 2 of the assessment will be published as part of the Preferred Strategy consultation.</p>
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Tata Steel submitted two separate parcels of land within its control through the candidate site process in August 2021.

1. Land to the north of Queen's Way (A4810), Newport (262 ha)
2. Land to the south of Queen's Way (A4810), Newport (132 ha)

Whilst the ELR refers to the existing Llanwern Steel Works site in its assessment of 'Existing Employment Areas' (Table 13), this relates solely to land to the north of Queensway. No reference is made to the land within Tata's control to the south of Queensway, either as an 'Existing Employment Area' or elsewhere in the ELR. This is despite the land being specifically put forward through the candidate site process in August 2021.

The assessment of land within the ELR identifies a total of 218.9 ha being available for B class uses. This includes existing allocations in the adopted LDP, land within existing employment areas and the Docks. No account is made for either of Tata's land parcels within this figure. As a result, the assessment of land available within Newport for B class uses (218.9 ha, including 55.4 ha at the Docks) is an underestimation of the supply actually available. As per our candidate site submission, there is a further 132 ha of land (c.99.7 ha net) within Tata's control to the south of Queensway that will be available for employment development over the plan period.

As per our submission to the candidate site process, Tata Steel would like to see specific reference/account taken of its landholdings at Llanwern within the Replacement LDP. This is addressed in further detail below, taking each parcel of land separately.

Parcel 1: Land to the south of the Queensway

The site comprises c.116 ha of existing steel related uses. The site also includes a further c.126 ha of under-utilised land.

The existing steel operations at the site will continue. There are, however, opportunities for further steel related high quality business, storage, logistics and manufacturing floorspace (Class B1, B2 and B8) over the plan period to accommodate Tata Steel operations and/or other downstream businesses. There is also potential to accommodate a broader range of steel related and other complementary uses within the site. This could include uses such as energy/renewable energy (including use of the now closed waste landfill), research and development campus/hub (in conjunction with higher education facilities) and rail/road facilities (utilising the direct access to the UK rail network which adjoins the site to the north and to which the site benefits from direct rail access).

Given the extent of the site, Tata Steel is considering opportunities to enhance its capability at Llanwern by investing in further manufacturing plant or relocating some of its down-stream businesses here. Tata Steel is also interested in exploring complementary developments that further utilise the existing direct connection to the UK rail network. In this context, Tata Steel would expect to have seen wider reference to its land north of Queensway in the ELR - in a similar way to how the Docks is referenced, i.e.

recognising that land is available, whilst noting it is likely to be used for predominantly Tata Steel operations and/or other downstream/related businesses.

Whilst the site is currently within the urban boundary identified in the adopted LDP, it is not subject to any other specific designation or allocation. Tata Steel would like to see a specific policy included in the Replacement LDP to recognise (1) the importance and status of the existing Steel Works and (2) the significant potential for further steel related and other complementary uses at the site. Recognition in a specific 'regeneration' policy would confirm the status and potential of the site over the plan period. As per our candidate site submission, Tata requests the inclusion of a specific policy as follows:

"Policy XX: Llanwern Steel Works

The existing 262 hectare employment site at Llanwern Steel Works is protected for Class B1, B2 and B8 uses and wider/ancillary uses supporting the operational steelworks. The Council will support new steel related uses as part of a 'steel hub' at Llanwern. The Council also supports other complementary uses at the site where it is demonstrated that the development would be supportive of the operational use as a Steel Works."

Land south of Queensway, Llanwern

The site extends to 132 ha and forms part of the existing Llanwern Steel Works. The site currently accommodates a range of existing industrial uses, including: Tarmac (asphalt and concrete plant), Civil & Marine (concrete batching plant), Wedge Group (galvanising plant) and Air Products (industrial gas plant). The site also accommodates a network of reed bed treatment systems, settlement lagoons, material storage areas, waste treatment areas and landfills.

Tata Steel is currently undertaking a programme of remediation combined with development enabling works in order to bring disused or under-utilised areas of the site back into beneficial use. These are projected to run until 2027 and will see parcels of land sequentially made available up to, throughout and beyond that period. These works include:

- Active remediation of soils affected by diesel and waste oil contamination at the former plant maintenance facility;
- Capping of landfills (with the addition of solar panels to the capped areas);
- Crushing and grading of unsorted slag materials for re-use as fill materials on site;
- Use of stockpiled dredged soils for use in capping the landfill on the adjacent operational steel works site;
- Landscaping works; and
- Infrastructure improvements and renewals.

The site is capable of accommodating a range of uses, including new high quality business, storage, logistics and manufacturing floorspace (Class B1, B2 and B8). There is also potential to accommodate a broader range of complementary uses within the site. This could include uses such as energy/renewable energy, filming/production studios or a research and development campus/hub (in conjunction with

higher education facilities). The mix of uses will be determined by market demand as the proposals are brought forward. Existing uses on the site are currently subject to ongoing short - term leases, the longest of which lasts to 2027. The future use of those leasehold parcels of land will be reviewed subject to discussions with the existing tenants.

The site has the potential to provide a net developable area of c.99.7 ha. This excludes areas forming part of the wider surface water management system, a retained lagoon, the designated SINC at the south east corner of the site and land underneath pylons which cross the site. The amount of new floorspace will be determined as the development process progresses. As a very broad indication of the potential level of new floorspace, it is estimated that the site could accommodate in the region of c. 500,000 sq m of Class B floorspace. This is based on a number of assumptions and will be refined at a later stage. As set out above, some of the land within Tata Steel's control to the south of Queensway is already in employment use. The site also represents a significant opportunity to bring forward new employment development within the plan period. Despite this, no reference is made to the land within the ELR - either as an Existing Employment Area or as a future allocation. It is important that the land is considered as part of the assessment of land supply available across the plan period.

As part of its candidate site submission in August 2021, Tata Steel specifically requested that the site is allocated in the Replacement LDP for new Class B1, B2 and B8 uses, together with other complementary uses. Whilst a majority of the site is currently within the urban boundary, it is not subject to any other specific designation or allocation. Recognition in a specific policy would confirm the potential of the site to deliver significant new economic development over the plan period. A specific policy/allocation would also provide greater certainty to help realise the strategic economic growth and investment potential of the site, which would be in line with the aims of national planning policy.

Tata Steel continues to reiterate its request for the inclusion of a specific policy to support future employment development at the site (as set out below). Alternatively, the site should form part of a wider employment allocation policy.

"Policy XX: Land to the south of Queen's Way, Llanwern

The Council will encourage and support new Class B1, B2 and B8 uses at the 132 hectare site to the south of Queen's Way. The Council will also support other complementary uses at the site (including renewables/energy related development, quasi- education uses and vehicle storage/parking)."

In summary, Tata Steel is concerned that its landholdings (as submitted through the candidate site process in August 2021) are not given due consideration in the ELR (February 2022). Land to the south of Queensway should have been assessed and included in the employment land supply figures set out in the ELR and carried across to the 'Growth and Spatial Options' consultation paper. Failure to do so significantly underplays the available land supply within Newport. Further reference should also have been made to Tata Steel's land to the north of Queensway.

<p>Tata Steel would welcome the opportunity to engage with the Council as the plan emerges to ensure the strategic importance and opportunities relating to its land holdings at Llanwern are recognised, supported and appropriately reflected through policy designations in the plan.</p>	
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GSO 052 - Welsh Government Soil Policy & Agricultural Land Use Planning - 00838

Question / Response	Officer Response
<p>I refer to your e-mail of the 25th of January consulting the Department as a Specialist Consultee on Newport's Replacement Local Development Plan (RLDP) "Growth and Spatial Options Consultation". This response is made in accordance with Technical Advice Note (TAN) 6, Annex B1 and B6.</p> <p><u>1. Policy</u></p> <p>BMV agricultural land is identified as a 'national natural resource' under Policy 9 of Future Wales: The National Plan 2040.</p> <p>The Policy for BMV agricultural land is included in Planning Policy Wales (PPW) 11 (February 2021) under paragraphs 3.58 and 3.59 as detailed below: -</p> <p>The Best and Most Versatile (BMV) Agricultural Land.</p> <p>3.58 Agricultural land of grades 1, 2 and 3a of the Agricultural Land Classification system (ALC) is the best and most versatile and should be conserved as a finite resource for the future.</p> <p>3.59 When considering the search sequence and in development plan policies and development management decisions considerable weight should be given to protecting such land from development, because of its special importance. Land in grades 1, 2 and 3a should only be developed if there is an overriding need for the development, and either previously developed land or land in lower agricultural grades is unavailable, or available lower grade land has an environmental value recognised by a landscape, wildlife, historic or archaeological designation which outweighs the agricultural considerations. If land in grades 1, 2 or 3a does need to be developed, and there is a choice between sites of different grades, development should be directed to land of the lowest grade.</p> <p>To meet the requirements of PPW paragraph 3.58 and 3.59, the Department expects the Policy to be considered at the earliest point in the RLDP process and throughout. The department also expects that BMV policy is sufficiently evidenced and justified in the plan, sustainability appraisal, spatial strategy and site selection process - what weight has been given to BMV land and how BMV policy has been applied to the spatial strategy and site selection. It is recommended that a specific topic paper is produced to demonstrate how BMV policy has been applied and addressed in the RLDP.</p> <p><u>2. Growth and Spatial Options</u></p> <p>It is appreciated that only a high-level assessment of the options has been undertaken at this point against the RLDP Objectives, and that further assessment will be undertaken to establish the preferred option.</p>	<p>Noted</p>

<p>It is welcomed that potential impacts of all options on BMV agricultural land are considered under the 'Natural Resources' RLDP objective, however it is not clear in the documents how this assessment has been undertaken, what evidence base on agricultural land quality has been used and what weight is given to BMV agricultural land in the assessment process.</p> <p>The Department will expect clear evidence of how BMV policy is considered for each option and in the determination of the preferred option in terms of 'considerable weight' in protecting BMV land from development, demonstrating an overriding need if BMV land needs to be developed and application of the sequential test approach.</p> <p>The Previously Developed Land (PDL) priority approach for the spatial options is welcome in respect if BMV agricultural land, however it is not clear currently how much PDL is available, and would this meet the needs of the RLDP, or will greenfield sites still be required? This should be evidenced and justified for the preferred strategy for all allocation types.</p>	
<p><u>3. Employment Land Need.</u></p> <p>The Future Employment Land need to 2036 is recommended as 77.00ha. However, there is also a recommendation to retain current LDP employment allocation sites (157.8ha or 90.4ha if East of Queensway is removed) in the RLDP. The Department would expect, for sites over the recommend need and involving BMV, justification to be provided in the RLDP as to how PPW paragraph 3.58 and 3.59 is addressed and how this is considered within the spatial options.</p>	<p>Noted. The Growth Option taken forward is discussed in detail in the Preferred Strategy Cabinet Paper, the Preferred Strategy Consultation Paper and associated Background Papers.</p>
<p><u>Integrated Sustainability Appraisal (ISA) Scoping Report and Evidence Base.</u></p> <p>Section 7.16 - 7.19 - The Department has concerns with the Land and Soil section of the ISA and the evidence base used for agricultural land quality information.</p> <p>Section 7.16 refers to 'Pre-1988 data...' on agricultural land quality. It is unclear if this is referring to the Predictive ALC Map (2019) or another source? The Department would welcome clarification on the data source used and that this is included in Annex B of the ISA.</p> <p>Section 7.17 refers to Figure B.13 in Annex B. This shows only validated ALC field survey data held by the Department and should be used together with Predictive ALC map information as per published guidance (see below).</p> <p>To assist LPA's in meeting BMV Policy requirements, the Department has produced the 'Predictive Agricultural Land Classification (ALC) Map for Wales (2019)'. This map is available to view on DataMap Wales and can be viewed and downloaded by LPA's via the link below. https://www.gov.wales/agricultural-land-classification-predictive-map</p> <p>The map has been produced as a first step to assist LPA's make informed decisions regarding agricultural land quality and application of BMV Policy at an early stage in plan development, and as an evidence base for strategic planning and sustainability appraisal.</p> <p>The Department has also published guidance on the use of the Predictive ALC Map together with a flow chart when to commission a detailed ALC survey. The guidance is available at:</p>	<p>Noted.</p>

<p>https://gov.wales/agricultural-land-classification-predictive-map-guidance Where the department holds detailed validated ALC field survey information for a site, this is also available via the link below: - https://datamap.gov.wales/layers/inspire-wg:Post_1988_ALC_Wales_Surveys . Section 7.38 - The Department disagrees with the statement made under the seventh bullet point that 'Newport's land is mostly unsuitable for agricultural uses due to its lower quality agricultural grading....' This is incorrect and should be amended. The ALC system assesses the capability of agricultural land for a wide range of cropping uses not the suitability for agricultural use of land. Section 7.39 - the Department would consider the ISA objective in respect of BMV would be to give 'considerable weight to protecting such land from development' as opposed to just 'minimising loss...'</p>	
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GSO 053 - Torfaen County Borough Council - 00032

Question / Response	Officer Response
<p>GROWTH OPTIONS: Growth Scenarios - Are there any scenarios that have been discounted which should be considered further, and why? Which of the options do you feel is the most appropriate, and why? Assessment of Growth Options Against RLDP Objectives - Are there any other matters that should be taken account of when assessing these scenarios and identifying a Preferred Strategy?</p>	
<p>1. No comment on whether any scenarios which have been discounted should be considered further. 2. No comment on which option is the most appropriate. 3. Consideration should be given to the need to relook at the scenarios subject to further 2021 Census date being released and the MYE issue. Understanding the regional picture will be an important part of the development of scenarios and the suitability and availability of lan</p>	Noted
<p>EMPLOYMENT LAND OPTIONS: Recommendation One - 4. Is this requirement appropriate for Newport? 5. Should it be different and if so, why? Recommendation Two - 6. Should some sites be removed from the employment supply? Why? 7. Should alternative land uses be considered for some sites? Please provide examples of such uses and your rationale for this.</p>	
<p>4. No comment on whether recommendation 1 or 2 should be chosen but the decision should be based on a review of existing allocations i.e., constraints and viability and location in relation to proposed residential sites.</p>	Noted

<p>6. Once the above has been completed and the candidate site process completed, and the sites assessed then a decision should be made on whether Option 1 or Option 2 should be chosen.</p>	
<p>SPATIAL OPTIONS:</p>	
<p>8. Which of these options do you feel is the most appropriate, and why?</p>	
<p>9. Are there any other spatial distributions that should be considered, and if so, why?</p>	
<p>10. Are there any other matters that should be given consideration when assessing these?</p>	
<p>8. Support the option of maximising the development of Previously Developed Land given the amount of land available to allow this and the focus on delivering residential development within the City Centre of Newport.</p> <p>9. The hybrid approach seems the most appropriate option that combines the benefits of the PDL approach (and availability) whilst supporting existing villages. It is difficult to comment further as the lack of information on the Candidate Site process and suitability of sites considering potential constraints e.g., Proposed Green Belt & ecology and infrastructure etc, the regional (Cardiff Capital Region) development levels in neighbouring Local Authorities.</p> <p>10. The submitted Candidate Sites and the assessment of their suitability and whether any of the suitable submitted Candidate are located within the areas identified as the preferred spatial distribution is information that should support the assessment of growth levels and spatial distribution decisions. There is a requirement for allocations to be deliverable yet there is a lack of information on the submitted Candidate Sites to identify if the proposed spatial distribution is supported by the development industry in terms of housing and employment.</p>	<p>Noted. The Spatial Option taken forward is discussed in detail in the Preferred Strategy Cabinet Paper, the Preferred Strategy Consultation Paper and associated background papers.</p> <p>Candidate Site assessments are being carried out as part of a separate process. The results of the Stage 1 assessment can be found in the Candidate Site's Register. Stage 2 of the assessment will be published as part of the Preferred Strategy consultation.</p>
<p>Other Comments</p>	
<p>We will continue to work with Newport City Council as the Plan progresses to ensure cross boundary issues are considered including housing growth levels. There is a need to work with Newport CC and our other neighbours to ensure an understanding of the regional context and collaborative/joint working on infrastructure requirements particularly adjoining Cwmbran to enable sustainable and resilient growth in both counties over the respective plan periods.</p>	<p>Noted As part of this process the LDP team will continue to work with partners, during the preparation of the replacement LDP to ensure any amendments to policy reflect the opportunities identified.</p>

GSO 054 - Gwent Wildlife Trust - 00041

Question / Response	Officer Response
<p><u>Background:</u> Gwent Wildlife Trust (hereafter referred to as GWT) takes a keen interest in the RLDP, due to its possible impact on the biodiversity of the Gwent Levels, including the Gwent Levels SSSI, a UK-nationally important site, statutorily designated for its nature conservation interest. We consider that the SSSI and wider Gwent Levels are not appropriate for built development, due to likely adverse impacts on the</p>	<p>Noted. The Growth Option taken forward is discussed in detail in the Preferred Strategy Cabinet Paper, the Preferred Strategy Consultation Paper and associated Background Papers.</p>

<p>biodiversity of this complex and fragile wetland ecosystem, and we will object to any proposed allocations on or otherwise adversely affecting the SSSI.</p> <p>We consider that the levels of growth set out in the Growth Options are unjustifiably high, and that the local planning authority has provided no robust rationale for this. Elevated levels of built development would result in a substantially higher risk of adverse impacts on the Gwent Levels, and for this reason we object to them.</p>	
<p>Growth Options:</p>	
<p>GWR objects to paragraph 1 of page 12 of the document, which states that :- "It is considered that some of these (ie the lower growth options) are unreasonable and can be discounted prior to assessment against the emerging plan objectives and the Integrated Sustainability Appraisal" (emphasis added)</p> <p>We further object to paragraph 3 page 12 of the document, which states :- "Only the higher scale of growth is to be considered further"</p> <p>We consider this to be a key admission, viz that the local planning authority is only considering aggressively elevated levels of growth, and provide no robust or transparent justification for this vitally important policy decision, which has taken place in the absence of any public participation in the LDP Formulation process thus far.</p> <p>This approach is deficient, because it closes down democratic debate as to the advisability or otherwise of aggressively elevated levels of growth. Citing Policy 33 of Future Wales as the only rationale behind this is unjustified, because other policies of Future Wales, such as Policy 9 relating to resilient ecosystems and green infrastructure, indicate otherwise, and the development plan (Future Wales) should be read "in the round" (see below)</p> <p>It is instructive to note that all of the five growth options discarded before the consultation was launched are lower than the lowest levels taken forward to the next stage (paragraph 3 page 12).</p> <p>It is also important to point out that the growth options taken forward are almost all themselves higher than the level set out in the adopted LDP (paragraph 2 page 12), which was itself acknowledged by the local planning authority to constitute a high level of growth, above a trend- based option (Table 1).</p> <p>GWT would like to point out that the emerging Cardiff local development plan will also allocate land at a higher level than a trend- based option, therefore Newport, in pursuing an aggressively high growth option, would be competing with a much larger city adopting the same approach. This form of wasteful competition could result in damage to the Gwent Levels' biodiversity interest.</p> <p>Thus, in conclusion to this section, GWT considers that lower growth options have been discounted without recourse to a proper democratic debate. This is not in conformity with the local planning authority's own CIS, nor with the provisions of the LDP Manual Wales. Additionally, the decision to discount lower (and we would argue more sustainable) growth scenarios in advance of the formulation of the ISA is not in conformity with the SEA Directive and Regulations, and the Welsh Government's good</p>	<p>Noted. These scenarios do not reflect Newport's focus for growth role established by the Future Wales National Plan 2040 and the RLDP must conform with this plan.</p> <p>The Growth Option taken forward is discussed in detail in the Preferred Strategy Cabinet Paper, the Preferred Strategy Consultation Paper and associated Background Papers.</p>

<p>practice guide to SEA, because inter alia the strategy of the adopted LDP was subject to ISA / SEA, and would have passed the tests of soundness following the LDP Examination. Whilst policy can change, it is unlikely that a growth strategy can go from being the local planning authority's preferred strategy, and passing the tests of soundness at Examination, to being so unacceptable that it is discarded without even being consulted upon as part of the RLDP in such a short period of time.</p> <p>Employment Land:</p> <p>GWT supports the recommendation not to allocate any further employment land over and above that allocated in the adopted LDP. However, the document does not contain enough detail for us to ascertain whether expansion of the Eastman/Solutia site would have advert impacts on the Gwent Levels, and we seek further, more detailed information in respect of this matter.</p> <p>Furthermore, the employment sites allocated but not developed in the adopted local development plan include land acknowledged by the local planning authority itself in Table 9 of its Employment Land Review Final Report 2022 as being on or abutting the Gwent Levels SSSI, viz Gwent Europark (16 ha). The local planning author is reminded that allocated sites in old local development plans cannot be simply "rolled forward" into new local development plans, and that all possible sites must be subject to the same rigours of a thoroughgoing and robust assessment (including inter alia ISA) in the light of modern planning thought. This being the case, it would seem very unlikely that the Gwent Europark site would survive those assessment processes, especially in view of the fact that the Gwent Levels SSSI is identified in the document itself as a "significant constraint" (see below).</p> <p>We therefore wish to preserve our position in respect of this site, and will be likely to object at later stages in the LDP formulation process if it is proposed for allocation.</p>	
<p>Spatial Options:</p> <p>At this stage in the local development plan formulation process, GWT provisionally supports the "Previously Developed Land-led" spatial option, because it would significantly reduce the likelihood of damage to Newport's biodiversity resources. However, this comes with the important caveat that much brownfield land is of substantive biodiversity value, and may be worthy of brownfield SINC/LWS designation.</p> <p>We are firmly of the view that any previously developed land site which may be proposed for allocation should be surveyed to EIA level from the point of view of biodiversity, to ascertain whether it is of substantial biodiversity value, and further that the provisions of Planning Policy Wales 11 and Technical Advice Note 5 in respect of brownfield land is complied with.</p>	<p>Noted. The Spatial Option taken forward is discussed in detail in the Preferred Strategy Cabinet Paper, the Preferred Strategy Consultation Paper and associated background papers.</p>
<p><u>The Local Planning Authority's Level of Protection Ascribed to the Gwent Levels in the Document:</u> GWT supports the local planning authority's identification of the Gwent Levels as a :- "Significant constraint" which will :- "limit where potential expansion could occur"</p>	<p>Noted</p>

However, we feel that this could be strengthened to the identification of the Gwent Levels as an "absolute constraint" on development, for the following reasons :-

1. SSSIs constitute only 12% of the land surface of Wales, and much of that is not, in any event, developable.
2. Newport City Council has declared a biodiversity and climate emergency, and Planning Policy Wales 11 establishes a strong protective context to SSSIs in relation to the Welsh town and country planning system, which is likely to be further strengthened by the forthcoming proposed amendments to Planning Policy Wales 11. The Minister has recently issued a series of Ministerial Statements on biodiversity and SSSIs, including in the light of COP 15 and the Welsh Government's Biodiversity Deep Dive.

All of the above leads us to be firmly of the view that the local planning authority should identify the SSSI as an absolute constraint, and that there should be a halt on major development on the Gwent Levels SSI.

Future Wales: The National Development Framework:

We consider that the local planning authority's treatment of the National Development Framework in the document is deficient, because whilst referring to Policy 33 (National Growth Areas), the document fails to make any reference whatsoever to Policy 9 (Resilient Ecological Networks and Green Infrastructure). Policy 9 is particularly relevant to the RLDP because it specifically namechecks the Gwent Levels as one of only six National Natural Resource Management Areas (NNRMAs) in Wales, and the exemplar for the other five.

The broad aim of the Gwent Levels NNRMA is to demonstrate what can be achieved at a landscape scale in terms of the sustainable management of natural resources (SMNR), and as Wales' statutory development plan, the local planning authority (and therefore the Replacement LDP) is required to have regard to it.

Policy 9 of Future Wales describes the Gwent Levels as :-

"... an ancient landscape with a special cultural significance. This area is also important for biodiversity, carbon storage and food production"

We concur with this.

The Welsh Government is developing its approach to the NNRMA through co-production pursuant to the Wellbeing of Future Generations (Wales) Act via the Gwent Levels Working Group, of which the local planning authority is a member.

The Document's Treatment of the Green Belt:

GWT supports the weight ascribed to the proposed Green Belt, to be delivered by a future Strategic Development Plan (SDP). We further support the local planning authority's policy in resisting development which would compromise the Green Belt.

Question / Response	Officer Response
<p>GROWTH & SPATIAL OPTIONS</p> <p>We set out herein our clients' response to the Newport Local Development Plan (rLDP) Growth and Spatial Options consultation paper. Our clients are promoting their site for development through the rLDP, it was submitted as part of the first informal call for interest. Our clients are pleased to be able to have the opportunity to feed into the early stages of the Plan preparation process and hope that their input is helpful in forming the key components of the Plan.</p> <p>Our clients' land at Risca Road, Rogerstone, (along with land owned by Woodland Amenity Limited) is capable of accommodating around 110 dwellings towards the Local Development Plan. It is noted that the site was submitted at the initial call for sites (our submission is at appendix 1 for ease), but it was not possible to provide additional information for the subsequent call for sites (due to COVID not allowing elderly shareholders to meet and the ill health and subsequent demise of the chairman of Woodland Amenities Limited) and as a result a smaller area was submitted by Mr Herbert. However, we can confirm that the whole of that site is now available for consideration in the rLDP, comprising land belonging to R Herbert, D & M Vaughan and Gwyllt Limited along with Woodland Amenities Limited (who our clients are working with). Accordingly, we provide at appendix 2 the latest proposals that our clients are currently working on for information.</p> <p>Our clients are in discussions with prospective house builders and housing associations in respect of the site and would welcome discussions with the Council on how it can contribute towards the Plan. Indeed, our clients are keen to demonstrate that the site would be deliverable, viable and sustainable such that they can provide a timetable for delivery to feed into the Council's trajectory both in terms of private and affordable homes. Whilst initial work on master planning, viability, ecology, landscape, transport and capacity has been undertaken (much of it previously submitted to the Council), an early meeting with the Council would assist with planning further work that is required on the proposals. We believe that given the time lapsed since the previous call for sites, it would be beneficial to factor in a second call for sites at the same time as the Preferred Strategy consultation to allow for further sustainable sites to be considered.</p> <p>Our client's response to the Growth and Spatial Options consultation is set out below and is to be considered against their overarching role which is to assist the Authority in achieving the objectives of the LDP and the Future Wales aspiration for Newport to increase its Strategic Role in the region.</p>	<p>Candidate Site assessments are being carried out as part of a separate process. The results of the Stage 1 assessment can be found in the Candidate Site's Register. Stage 2 of the assessment will be published as part of the Preferred Strategy consultation.</p>
<p>GROWTH OPTIONS:</p> <p>Growth Scenarios -</p> <p>1. Are there any scenarios that have been discounted which should be considered further, and why?</p>	
<p>We are strongly of the view that it is appropriate to discount the low growth options. In this regard, Policy 33 of Future Wales states that the Welsh Government support an "increased strategic role"</p>	<p>Noted. The Growth Option taken forward is discussed in detail in the Preferred Strategy Cabinet Paper, the Preferred</p>

<p>however this cannot be a continuation of its existing role or approach towards growth and the benefits that it can bring, rather it requires enhanced levels of growth and investment.</p> <p>Table 1 provides a useful point of reference for establishing how an increased strategic role may be facilitated. Clearly in order to comply with Future Wales the Plan requires a level of growth that is at the very least equal to or greater than the current LDP level of growth, as such it can not be justified removing the PG Short Term level of growth. Whilst they are very similar, this along with the Dwelling Led 5yr level are the only two approaches that would seek a higher level of growth than is presently the case and therefore comply with Future Wales, all of the others would imply a reduced strategic role. Notwithstanding this, we accept the Council's reasons for discounting at this stage in order to avoid duplication of consideration. We set out the reasons for a higher level of growth in more detail in our answer to question 2 below.</p>	<p>Strategy Consultation Paper and associated Background Papers.</p>
<p>2. Which of the options do you feel is the most appropriate, and why?</p>	
<p>It is clear that the only two options that are appropriate, in line with Future Wales and an increased Strategic Role for Newport are those that are higher than the existing LDP level and in this regard we strongly believe that the Dwelling Led 5yr level is the most appropriate. It is clear that Future Wales anticipates Newport growing "in and immediately adjoining" the settlement and an increased strategic role for the city. As such it is key that an aspirational level of growth is sought that seeks to drive the increase to reflect the strategic role that Newport plays and to drive the regional economy.</p> <p>We would note that Wales as a whole is facing its most significant challenges for some considerable time and it is without question the case that the Replacement LDP is being prepared under some of the most challenging societal and economic conditions since World War Two.</p> <p>There are numerous factors providing the context for the level of growth sought which we believe point towards the higher levels. We set these out summarily below but note their importance in a higher growth requirement.</p>	<p>Noted. The Growth Option taken forward is discussed in detail in the Preferred Strategy Cabinet Paper, the Preferred Strategy Consultation Paper and associated Background Papers.</p>
<p><u>Post Covid 19 recovery, energy crisis and Brexit</u></p> <p>It is clear that Newport faces significant challenges in order to achieve an increased strategic role in the context of the post Covid economy, Brexit Recovery and the ongoing energy crisis. Indeed, over recent years we have experienced exceptional circumstances that have the potential to severely and drastically impact upon the economy and society as a whole. We are strongly of the view that the planning process must play its part in helping to facilitate the economic recovery that is needed. Plainly economic recovery must form an over-riding requirement of the plan and without question must underlie the approach to be taken. An appropriate response to achieve an increased strategic role would be to plan for higher levels of growth than over recent plan periods.</p>	<p>Noted. The Growth Option taken forward is discussed in detail in the Preferred Strategy Cabinet Paper, the Preferred Strategy Consultation Paper and associated Background Papers.</p>
<p><u>Constraints in adjoining Authorities</u></p> <p>In addition to meeting its own needs the Council will need to consider the lack of housing supply in neighbouring Authorities. Indeed, Future Wales is also clear that "Growth at Newport will help manage</p>	<p>Noted. NCC is supportive of cross council working and joint working and effectively tackling cross boundary issues.</p>

<p>the development pressures in the region by providing a strategic growth focus for the eastern part of the area". Newport has not just been dealing with its own needs in recent years and accordingly needs to consider the offsets from new homes not being provided in its neighbouring authorities. Whilst housing land supply requirements were formally abandoned by the Welsh Government, it does not change the record of poor delivery elsewhere and it follows logically that where needs aren't met within an Authority, they will need to be accommodated somewhere. Whilst this is an unsatisfactory and unsustainable position there is unlikely to be any change in this in the short term. Indeed:</p> <ul style="list-style-type: none"> -Torfaen & Caerphilly - as of April 2021 there was a cumulative shortfall across the two Authorities of over 4,000 dwellings from the levels envisaged within their respective Local Development Plans. This represents the number of households that could not be provided for in those respective Authorities. This is a shortfall of national significance that has a profound effect on house prices across the region; and - Monmouthshire - representations made by the Welsh Government on the Monmouthshire rLDP mean that further new housing allocations would not be needed in Monmouthshire. Given the additional constraints in Monmouthshire, including Phosphates and anticipated marine nitrates, it is likely that demand will be displaced from Monmouthshire to adjoining Authorities. <p>Plainly, policy and supply constraints in adjoining Authorities will have a significant impact upon Newport City Council in respect of the housing market and affordability issues. This is a challenge that the LDP needs to respond to with higher growth rates than previous years in order to achieve an increased strategic role.</p>	<p>The Growth Option taken forward is discussed in detail in the Preferred Strategy Cabinet Paper, the Preferred Strategy Consultation Paper and associated Background Papers.</p>
<p><u>Meeting needs</u></p> <p>It will be of utmost importance to ensure Newport establishes a level of growth that meets needs and does not exacerbate the existing supply constraints in South Wales, taking into consideration the shortfalls in adjoining Authorities alongside Newport's own needs. We believe that the highest level of growth will need to be set in order to meet the Vision and fulfil the strategic aspirations for Newport as a Gateway City to Wales. In this regard it is noted that:</p> <ul style="list-style-type: none"> - given the potential impacts of Covid 19 on the economy and society, there will be a need to adopt a highly ambitious strategy which provides far greater flexibility to respond to the crisis through added stimulation of the construction sector; -account should be taken in the baseline figures of the levels of sustainability and selfcontainment that can be achieved through embracing working from home trends for those sectors where it is feasible. These are often the high added value jobs that are no longer tied to cities such as Bristol or Cardiff but can retain expenditure in the local area and encourage vibrant local areas; and -any requirement should ensure an appropriate level of flexibility for delivery indeed, it may be that a 20% flexibility allowance or greater provides an appropriate starting point. We will comment on this further when detailed information becomes available. 	<p>Noted. The Growth Option taken forward is discussed in detail in the Preferred Strategy Cabinet Paper, the Preferred Strategy Consultation Paper and associated Background Papers.</p>
<p><u>Addressing affordability</u></p>	<p><u>Noted</u></p>

<p>The Council's result in nearly achieving its affordable housing target for 2015-2020 is to be welcomed. However, the Council recognise that this is only a small proportion of the actual level of need. The latest Local Housing Market Assessment (LHMA) indicates that "as of the 31st March 2017 there were 6,838 households with active applications on the housing waiting list. In order to clear this backlog during the 5 year life of this LHMA we would need to allocate 1,368 units of accommodation each year". The final stated annual shortfall is 559 per annum which equates to 2,795 over the five year period. This is plainly a significant issue within the Authority which has no doubt been exacerbated by price increases that have been caused due to shortages of housing supply outside of the County.</p> <p>Our client is of the view that the replacement LDP provides an opportunity to seek to address affordability in a meaningful and substantive way.</p>	
<p>3. Are there any other matters that should be taken account of when assessing these scenarios and identifying a Preferred Strategy?</p>	
<p>We have considered the assessment of each of the options and have commented where we believe that the assessment could be reviewed. Importantly, with regards to the lower growth options that are considered (options 2 to 6) in the first instance, we do not believe that these will contribute towards the Future Wales aim for Newport to have an increased Strategic Role in South Wales. This should form part of the assessment.</p>	<p>Noted. The Growth Option taken forward is discussed in detail in the Preferred Strategy Cabinet Paper, the Preferred Strategy Consultation Paper and associated Background Papers.</p>
<p><u>Option 1: 12,570 new homes and 12,945 jobs</u></p> <p>With regards to the higher growth option we have suggested that a number of the "colours" should be improved based on the potential for positive outcomes. Indeed, greater levels of investment in line with an Increased Strategic Role for Newport would have the potential to bring many significant benefits across the assessment areas. We are strongly of the view that this is the only option that would allow Newport to strive towards an increased Strategic Role in line with Future Wales.</p> <p>Our analysis is below</p>	<p>This assessment was produced for the purpose of the Growth and Spatial Options consultation, however the Integrated Sustainability Appraisal (ISA) assesses these in more detail.</p>
<p>Economy & Employment</p>	<p>We support the overall conclusions of this assessment</p>
<p>Population & Communities</p>	<p>We support the overall conclusions of this assessment</p>
<p>Health & Well Being</p>	<p>We support the overall conclusions of this assessment</p>
<p>Equality, Diversity and Inclusion</p>	<p>We support the overall conclusions of this assessment</p>
<p>Transport & Movement</p>	<p>Newport has been identified as a location for growth within Future Wales specifically because it is a sustainable location for growth. Its communities are well connected to public transport and well served by facilities. Indeed, our clients' sites at Risca Road are clear examples of this, being within two minutes walking distance of a train station. We note that it is indicated that more opportunities for investment could be apparent under high scenarios, we</p>

	believe that the Council's assessment should be more positive on this – indeed, higher levels of growth would enable a step change in investment and enhancement that could be a significant benefit. This should be re-assessed as green. Indeed, this is far more likely to be the case than for small scale, incremental and piecemeal infill development and ad-hoc brownfield sites.	
Natural Resources	We are surprised by the comments set out herein, it is noted that water consumption would increase for all options however, there are sustainable means of managing this. Much of the landscape surrounding Newport (where it is not at risk of flooding) is heavily influenced by negative urban impacts. New greenfield sites can provide a means of softening urban edges through more appropriate landscape buffers, open space and interface with rural areas We also support the notion that greater investment brings the potential for more sustainable lifestyles, as greater facilities would exist and as construction techniques evolve and progress We are strongly of the view that with appropriate planning interventions, this could be at least an orange category if not green.	
Biodiversity and Geodiversity	Again the categorisation red seems inappropriate (Option 5 and 6 are green) yet brownfield sites have equal (if not greater) chance of disturbing habitats and actually being unable to adequately mitigate. There is significant opportunity to provide ecological enhancement and net gain from greenfield sites, this includes to Sites of Importance for Nature Conservations (SINCs).	
Historic Environment	We would note that each case would need to be dealt with based on its own merits, albeit there are more heritage assets (including Listed Buildings and Conservation Areas) within the urban area than there are in surrounding green fields.	
Landscape	As noted earlier much of the landscape surrounding Newport (where it is not at risk of flooding) is heavily influenced by negative urban impacts. New greenfield sites can provide a means of softening urban edges through more appropriate landscape buffers, open space and interface with rural areas	
Climate change	With regards to Flooding, there are considerable issues for existing properties in Newport, growth means higher investment and the potential to contribute towards solving existing problems. Increased investment in local facilities would mean potentially increasing sustainability.	

	A higher growth strategy will actively prevent growth being dispersed. Indeed, low growth means that people would “jump” the green belt – leading to greater in commuting or travel to Bristol and Cardiff	
With regards to the remaining options, we note:		
<p><u>Option 2: 9,450 new homes and 10,695 Jobs & Option 3: 9,570 new homes and 8,640 jobs</u> Given the similar scale of growth we consider both options in the following table in order to minimise duplication. It is noted in the first instance that these would be contrary to the Future Wales aspiration for Newport to achieve an increased strategic role.</p>		This assessment was produced for the purpose of the Growth and Spatial Options consultation, however the Integrated Sustainability Appraisal (ISA) assesses these in more detail.
Economy & Employment	We support the overall conclusions of this assessment	
Population & Communities	We support the overall conclusions of this assessment	
Health & Well Being	We support the overall conclusions of this assessment	
Equality, Diversity and Inclusion	We support the overall conclusions of this assessment	
Transport & Movement	We support the overall conclusions of this assessment for both options	
Natural Resources	<p>As with option 1, we are surprised by the comments set out herein, it is noted that water consumption would increase for all options however, there are sustainable means of managing this.</p> <p>In addition, much of the landscape surrounding Newport (where it is not at risk of flooding) is heavily influenced by negative urban impacts. New greenfield sites can provide a means of softening urban edges through more appropriate landscape buffers, open space and interface with rural areas.</p> <p>We also support the notion that greater investment brings the potential for more sustainable lifestyles, as greater facilities would exist and as construction techniques evolve and progress.</p> <p>We are strongly of the view that with appropriate planning interventions, this could be at least an orange category if not green.</p>	
Biodiversity and Geodiversity	<p>Again the categorisation seems inappropriate (Option 5 and 6 are green) yet brownfield sites have equal (if not greater) chance of disturbing habitats and actually being unable to adequately mitigate.</p> <p>There is significant opportunity to provide ecological enhancement and net gain from greenfield sites, this includes to SINC and Special Areas of Conservation (SACs).</p>	
Historic Environment	It is unclear why options 2 and 3 are scored differently.	

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	We would note that each case would need to be dealt with based on its own merits, albeit there are more heritage assets (including Listed Buildings and Conservation Areas) within the urban area than there are in surrounding greenfield.	
Landscape	We support the overall conclusions of this assessment	
Climate change	With regards to flooding, there are considerable issues for existing properties in Newport, growth means higher investment and the potential to contribute towards solving existing problems Increased investment in local facilities would mean potentially increasing sustainability. A higher growth strategy will actively prevent growth being dispersed. Indeed, low growth means that people would "jump" the green belt - leading to greater in commuting or travel to Bristol and Cardiff.	
<p><u>Option 4: 7,950 new homes and 9,405 Jobs, Option 5: 8,100 new homes and 6,720 jobs & Option 6: 7,605 new homes and 5,835 jobs</u></p> <p>Given that Options 4, 5 and 6 are low growth options with broadly similar levels of new homes, we set out our combined comments on these options below in order to avoid duplication. It is noted in the first instance that these would be contrary to the Future Wales aspiration for Newport to achieve an increased strategic role</p>		This assessment was produced for the purpose of the Growth and Spatial Options consultation, however the Integrated Sustainability Appraisal (ISA) assesses these in more detail.
Economy & Employment	We are of the view that these low growth options should all be categorised as red as they would not provide the combination of jobs and homes required to provide an increased strategic role for Newport	
Population & Communities	We are of the view that these low growth options should all be categorised as red as they would not provide the combination of jobs and homes required to provide an increased strategic role for Newport	
Health & Well Being	At the lower scales of growth these options are unlikely to provide the investment required in such facilities rather it would be a continuation of existing levels.	
Equality, Diversity and Inclusion	We support the overall conclusions of this assessment however, question whether this should be red given the importance of meeting needs.	
Transport & Movement	With each option there would be fewer opportunities for significant levels of investment in improved infrastructure or sustainable means of travel.	
Natural Resources	It is clear that lower growth levels would require less greenfield land which would clearly result in a continuation of the existing urban / rural interface. However, there are areas that could benefit from new landscaping / planting to soften the interface and provide visual benefits in this regard.	

Biodiversity and Geodiversity	The categorisation seems in appropriate and it is unclear why options 5 and 6 are green yet brownfield sites have equal (if not greater) chance of disturbing habitats and actually being unable to adequately mitigate due to more limited land availability on site. They do not have the same level of opportunity to provide ecological enhancement and net gain as greenfield sites.	
Historic Environment	We would note that each case would need to be dealt with based on its own merits, albeit there are more heritage assets (including Listed Buildings and Conservation Areas) within the urban area than there are in surrounding greenfield.	
Landscape	It is clear that lower growth levels would require less greenfield land which would clearly result in a continuation of the existing urban / rural interface. However, there are areas that could benefit from new landscaping / planting to soften the interface and provide visual benefits in this regard.	
Climate change	With regards to Flooding, there are considerable issues for existing properties in Newport, growth means higher investment and the potential to contribute towards solving existing problems. There would potentially be less investment in sustainability. Lower growth is likely to contribute towards increased commuting whereby people would be priced out of the local market and “jump” the greenbelt to alternative locations where homes are available.	

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EMPLOYMENT LAND OPTIONS:	
Recommendation One -	
4. Is this requirement appropriate for Newport?	
We are supportive of the recommendations of the Employment Land Review which seek to protect 157.8 ha of supply in order to achieve the 77ha requirement. We believe that this approach provides flexibility to achieve the Future Wales approach towards increasing the Strategic Role of Newport.	Noted
5. Should it be different and if so, why?	
As noted above, we support the recommendations of the Employment Land Review. Recommendation Two -	Noted
6. Should some sites be removed from the employment supply? Why?	
The Employment Land Review recommends that all the sites listed in Table E1 of the Executive Summary are retained within the RLDP, this includes both the Solutia Site and Queensway Meadows, therefore it is unclear why their removal is being considered, further clarity over this would be required in order for us to consider further but based on the evidence available to date we oppose the removal of employment land.	Noted. The Employment Land Review (NB not executive summary) discusses this in more detail, including the recommendations regarding East of Queensway Meadows at section 8.8.

It is noted that if Newport is to achieve its increased Strategic Role, it is imperative that it is providing a balance of jobs and homes and a significant supply of deliverable land for both purposes is available.		
7. Should alternative land uses be considered for some sites? Please provide examples of such uses and your rationale for this.		
Given our response to question 6, we have no further comments on this question.		Noted
SPATIAL OPTIONS:		
8. Which of these options do you feel is the most appropriate, and why?		
We consider that the urban expansion option provides the most appropriate solution, this is framed on our approach towards growth which is based on the higher growth option (1) being the only approach that would be in compliance with Future Wales (i.e. an increased strategic role for Newport). For this reason we believe that the previously developed land (PDL) approach and Village Focus approaches should both be ruled out at this stage.		Noted. The Spatial Option taken forward is discussed in detail in the Preferred Strategy Cabinet Paper, the Preferred Strategy Consultation Paper and associated Background Papers.
<u>Urban Expansion & Hybrid Options</u> We note that there are various overlaps between the Urban Expansion and Hybrid Options, and we consider them jointly in the below table given the similarities. Indeed, we believe that given the lack of large suitable previously developed sites that may be available as new allocations, the PDL element is likely to be comprised of those existing allocations that are proven to be deliverable and capable of being rolled over alongside a small scale windfall assumption. As such with both options the amount of greenfield expansion land is likely to be similar given the scale of growth required in order to meet the strategic role of the City. However, we note that in respect of villages, it is likely to only be appropriate to consider small scale development parcels to meet local needs, rather than any significant scale of expansion. Our comments in respect of the assessment of both is set out below		This assessment was produced for the purpose of the Growth and Spatial Options consultation, however the Integrated Sustainability Appraisal (ISA) assesses these in more detail.
Economy & Employment	Future Wales is clear that growth should be in and around Newport. As such, this approach would clearly be in line with the policy hierarchy. It is noted that over recent years there has been a concentration of development in the east of the City, there would be an opportunity with urban expansion to re-focus on the west, north west and north of the City. We are strongly of the view that this should be green for both the Urban Expansion option and the Hybrid Option. Population & Communities	
Population & Communities	We support the overall conclusions of this assessment with respect to the Hybrid Option but believe that the same conclusions could be drawn from the Hybrid Option due to the fact that a similar quantum of greenfield development will be required in both scenario	
Health & Well Being	We support the overall conclusions of this assessment with respect to the Hybrid Option but believe that the same conclusions could be drawn from the	

	Hybrid Option due to the fact that a similar quantum of greenfield development will be required in both scenario.	
Equality, Diversity and Inclusion	We believe that for both Urban Expansion and Hybrid Options, the assessment should be green. Indeed, both will facilitate significant opportunities for improvements and this should not be down played.	
Transport & Movement	Newport has been identified as a location for growth within Future Wales specifically because it is a sustainable location for growth. Its communities are well connected to public transport and well served by facilities.Indeed, our clients' sites at Risca Road) are a clear example of this, being within 2 minutes walking distance of a train station. We note that it is indicated that more opportunities for investment could be apparent under high scenarios, we believe that the Council's assessment should be more positive on this – indeed, higher levels of growth would enable a step change in investment and enhancement that could be a significant benefit. This should be re-assessed as green. Indeed, this is far more likely to be the case than for small scale, incremental and piecemeal infill development and ad-hoc brownfield sites.	
Natural Resources	We are surprised by the comments set out herein, it is noted that water consumption would increase for all options however, there are sustainable means of managing this. Much of the landscape surrounding Newport (where it is not at risk of flooding) is heavily influenced by negative urban impacts. New greenfield sites can provide a means of softening urban edges through more appropriate landscape buffers, open space and interface with rural areas. This has been actively demonstrated on our clients' sites which act as a gateway site to Newport from Caerphilly. We also support the notion that greater investment brings the potential for more sustainable lifestyles, as greater facilities would exist and as construction techniques evolve and progress. We are strongly of the view that with appropriate planning interventions, this could be at least an orange category if not green.	
Biodiversity and Geodiversity	Again the categorisation seems inappropriate yet brownfield sites have equal (if not greater) chance of disturbing habitats and actually being unable to adequately mitigate. There is significant opportunity to provide ecological enhancement and net gain from greenfield sites, this includes to SINCS. This is demonstrated by work undertaken on our client's site, where there are significant opportunities for betterment.	

Historic Environment	We would note that each case would need to be dealt with based on its own merits, albeit there are more heritage assets (including Listed Buildings and Conservation Areas) within the urban area than there are in surrounding green fields. Sites within our client's control would have no impacts on heritage assets.	
Landscape	As noted earlier much of the landscape surrounding Newport (where it is not at risk of flooding) is heavily influenced by negative urban impacts. New greenfield sites can provide a means of softening urban edges through more appropriate landscape buffers, open space and interface with rural areas.	
Climate change	With regards to Flooding, there are considerable issues for existing properties in Newport, growth means higher investment and the potential to contribute towards solving existing problems. As such, sites such as our clients where flooding is not a constraint but are in sustainable locations form a solution to this and cannot be considered negative. Increased investment in local facilities would mean potentially increasing sustainability. Appropriate levels of growth being identified would prevent growth being dispersed across numerous local authorities which has happened over recent years due to supply constraints. Low growth means that people would “jump” the green belt – leading to greater in commuting or travel to Bristol and Cardiff	
10. Are there any other matters that should be given consideration when assessing these?		
<p>In supporting our assessment of both the highest growth option and spatial approach which requires greenfield land, we set out below a number of key considerations in the benefits that they can bring. In particular in helping Newport to achieve an increased strategic role but also in terms of the other key assessment areas.</p>		Noted
<p><u>Sustainable growth locations</u></p> <p>It is inevitably the case that the supply of brownfield sites in Newport for redevelopment for residential purposes is limited. As such, the Council will need to consider sustainable and appropriate greenfield locations based around existing communities in line with Future Wales (ie growth in and around Newport). In reality, this is likely to focus on the western and north western parts of the City extents associated with existing built form and communities. Indeed, we are of the view that the LDP must not neglect the requirements of these existing communities in favour of more remote areas on the Eastern side of the City that would be more aligned to commuting patterns along the M4.</p> <p>It is anticipated that such focal points for proportionate growth include a number of existing communities with local facilities that can provide an opportunity to maximise levels of self-containment and sustainability. Indeed, proportionate growth can help to reinforce existing levels of sustainability but also seek to provide additional facilities and uses that can move to a greater level of neighbourhood and</p>		Noted. The Deposit Plan will include reviewed urban and village boundaries.

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<p>community well-being. In this regard, our clients consider that Rogerstone is a suitable location to accommodate further sustainable growth.</p>	
<p><u>Rogerstone</u> Our clients' site at Risca Road, Rogerstone is approximately 7.16ha in size and broadly rectangular in shape, it can accommodate around 110 dwellings and provide a large area of landscape planting and biodiversity gain on site. It is located immediately adjoining the north western extent of the settlement boundary for Rogerstone. It comprises a former allotment garden and adjacent grazing land that has degraded in its quality. To the south the site adjoins Risca Road. To the east is housing fronting Pontymason Lane, beyond which is further residential development.</p> <p>The site occupies a highly sustainable location and residents would be well placed to benefit from easy access to existing local services as well as wider facilities through walking, cycling and public transport. The Monmouthshire and Brecon Canal to the north of the site links into wider recreational and functional walking and cycling routes.</p> <p>Importantly the whole of the site lies within 700m walking distance of Rogerstone Railway Station which is one of the few South Wales Metro rail connections within Newport - a focal point around which new development should be encouraged. It means that future residents of the site would be within five minutes walking distance of a transport service that links to Cardiff, Ebbw Vale, and beyond (to Swansea, Bristol, London and the Midlands). Furthermore, regular bus services run along Risca Road providing links between Newport and Risca/Pontymister as well as between Newport and Blackwood.</p> <p>The site is within easy walking and cycling distance of a good range of facilities. These include supermarkets at Afon Village and Pontymister/Risca, a post office, various shops, restaurants, places of worship, recreation (the Rogerstone Welfare and Afon Village community centre / Muga, Rivermead as well as Newport Golf Club and Pontymister cricket and bowling clubs and the Fugitives cricket club) and employment areas such as the Wern, Tregwilym and Pontymister industrial / trading estates as well as Cleppa Business Park.</p> <p>Rogerstone Primary School (2200m), Jubilee Park (2000m) and Mount Pleasant Primary Schools (1500m), and Bassaleg Secondary School (2.8km) are also conveniently located to the site along with the Risca Community Comprehensive School (Pontymason Lane) (500m) which has a leisure centre alongside.</p> <p>The wide array of local facilities affords an opportunity for future residents to maximise the proportion of their everyday lives within their local neighbourhood without relying upon the need for private car trips. Indeed, everyday needs can be catered for in the local neighbourhood and more strategic trips (for instance to the centre of Newport or Cardiff) can be made via the South Wales Metro system, reaching such destinations within 10 to 20 minutes and reducing the need to travel by car.</p> <p>It is considered an appropriate location for the provision of proportionate growth that would complement existing facilities and provide more opportunities for local people to remain in the area.</p>	<p>The Deposit Plan will include reviewed urban and village boundaries.</p>

<p>Importantly it would contribute to addressing a number of the issues set out within each of the draft Objectives in particular by virtue of the fact that it would be providing homes in a sustainable location that it is well linked to existing facilities and both active and public transport networks. The site presents an opportunity:</p> <ol style="list-style-type: none"> 1. to provide plots for high quality self-build homes for local people helping to support the rich mix of uses and house types required. This will meet a significant need that is not currently well catered for. It will help provide homes for families for life; 2. to support and enhance existing facilities and services through providing homes in an appropriate location; 3. to provide an opportunity to focus development around the existing train station which acts as a hub where such intensification is entirely appropriate and sustainable, helping to create a move away from reliance upon the private car; 4. to capitalise on its location in close proximity to the canal to the north and the recreational benefits associated; 5. to increase access to other formal recreation utilising the wide range of existing facilities located nearby including the Multi Use Games Area (MUGA) at the Rivermead Centre, Risca Leisure Centre, Newport Golf Club and Rogerstone Welfare as well as the cricket clubs at High Cross, Whiteheads and Pontymister cricket and bowls facilities; 6. to enhance the entrance into both Rogerstone and Newport from Caerphilly in the north. Indeed, the site can become an attractive gateway into the Authority; 7. to adopt an approach to design that reflects the traditional local character, density and appearance; 8. to make appropriate use of a former allotment site and declining pasture to provide a betterment in terms of green infrastructure and biodiversity through enhancements on site and off site if required 	
<p>EVIDENCE BASE:</p>	
<p>11. Are there any other pieces of evidence that you believe should inform the development of the preferred growth and spatial options strategies?</p>	
<p>It is noted that only limited evidence is currently available and it is clear that there will be a need to publish significantly more evidence in respect of matters such as supply of housing land.</p>	<p>Noted</p>
<p>12. Are there any other comments you'd like to make regarding anything within this consultation document? Do you agree with the Objectives for the RLDP? If not, how and why do you think they should be changed?</p>	
<p>We have commented previously on the Objectives of the RLDP and reserve the right to comment further once the updated Objectives are consulted upon.</p> <p>For ease of reference, it is noted that in general terms we are supportive of the overall approach towards the objectives, however, we believe that particular attention is needed with regards to economic and population / community objectives. As we have stated earlier, there are significant challenges ahead and</p>	<p>Noted. The Deposit Plan will include reviewed urban and village boundaries.</p>

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<p>it must be the role of the planning process to help address these issues rather than constrain recovery and realignment.</p> <p>We are strongly of the view that well planned urban extensions can contribute towards a range of the key objectives not just in respect of population and communities, inclusive of:</p> <ul style="list-style-type: none"> o including a variety of housing types, tenures and densities along with neighbourhood centres with mixed uses and a range of facilities; o providing a landscape structure that builds on existing assets, including green infrastructure within the development, linking urban areas to the countryside beyond and creating a distinctive edge to the urban area; o providing opportunities for people to work locally and for small businesses to set up, grow and thrive o addressing the challenges that exist in the aftermath of Brexit and Covid and ensure that Newport can embrace and facilitate new markets and technologies; o presenting an opportunity to design energy efficient communities; o allowing pedestrian, cycle and public transport networks to be fully integrated, often improving services available to the adjacent communities, increasing health and well-being by reducing the reliance on cars; and <p>T supporting the surrounding communities by providing homes for local people</p>	
<p>Other comments</p> <p>It is noted that our clients are currently in the process of liaising with house builders and housing associations in respect of refining development proposals for the site. However, they would welcome engagement with the Council on whether they consider either site could play a role in the delivery of sustainable communities through the replacement LDP.</p>	<p>Noted</p>

GSO 056 - Nicola Newton - 00839

Question / Response	Officer Response
<p>I was disappointed to hear from local councillor Steve Cocks that the Caerleon railway station may be removed from the updated plan.</p> <p>Surely this should be included to encourage travel on public transport.</p> <p>I gather the concern is that it will bring more cars into Caerleon. I think that the facility should not include car parking on a significant scale so that people can bus,cycle,walk to the station.</p> <p>I hope to see that progress is not stopped and the station is included in the plan. How else will we ever be able to travel around without cars?</p>	<p>The role of the Local Development Plan is to facilitate new and improved stations, but it does not directly allocate these or determine the location of new stations.</p> <p>As part of this process the LDP team will continue to work with partners, including Welsh Government and Transport for Wales, during the preparation of the replacement LDP to ensure any amendments to policy T1 reflect the opportunities identified by the appropriate transport strategies and that our development strategy seeks to</p>

	support the delivery of strategic and local transport improvements.
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GSO 057 - Elizabeth Miles - 00840

Question / Response	Officer Response
<p>I'm writing to express my support for including a walk up style station in Caerleon as well as in Ponthir. My family would certainly use either and it would stop us using our cars. In fact we'd get rid of one car completely.</p>	<p>The role of the Local Development Plan is to facilitate new and improved stations, but it does not directly allocate these or determine the location of new stations.</p> <p>As part of this process the LDP team will continue to work with partners, including Welsh Government and Transport for Wales, during the preparation of the replacement LDP to ensure any amendments to policy T1 reflect the opportunities identified by the appropriate transport strategies and that our development strategy seeks to support the delivery of strategic and local transport improvements.</p>

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GSO 058 - Dr Sophie John - 00841

Question / Response	Officer Response
<p>I am expressing my support for the re-opening of a train station in Caerleon;</p> <p>This would greatly reduce congestion on the roads in Caerleon, especially given all the new homes in the University site. It would also decrease the concerning high levels of pollution in Caerleon only benefitting the health of residents and school children which are situated very close to the high pollution areas.</p> <p>train station would increase links to other towns and improve transport to different cities. As we know, the M4 around Newport is a continuous problem and as the M4 relief road was scrapped it would mean many people in Caerleon, who work in Newport, Cardiff and further afield, could easily get quicker, safer, greener and cleaner transport.</p> <p>It would also improve links for people wanting to come into Caerleon, given all the historic interest and visitors we receive annually. This would only improve income to support local businesses.</p>	<p>The role of the Local Development Plan is to facilitate new and improved stations, but it does not directly allocate these or determine the location of new stations.</p> <p>As part of this process the LDP team will continue to work with partners, including Welsh Government and Transport for Wales, during the preparation of the replacement LDP to ensure any amendments to policy T1 reflect the opportunities identified by the appropriate transport strategies and that our development strategy seeks to support the delivery of strategic and local transport improvements.</p>

<p>A train station by the cycle path would be very well situated. In a world where we are trying to work towards a net zero target by 2050, making positive environmental improvements such as this seems like a great step forward that could be taken by NCC.</p>	
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GSO 059 - Barratt David Wilson Homes - 00850

Question / Response	Officer Response
<p>GROWTH OPTIONS: Growth Scenarios - 1. Are there any scenarios that have been discounted which should be considered further, and why? 2. Which of the options do you feel is the most appropriate, and why? Assessment of Growth Options Against RLDP Objectives - 3. Are there any other matters that should be taken account of when assessing these scenarios and identifying a Preferred Strategy?</p>	
<p><u>Background</u> Chapter 3 of the Growth and Spatial Options Document presents and seeks feedback on a series of growth scenarios which would in turn inform the housing requirement and the number of jobs to be planned for (which in turn would derive the employment land requirement). Initially, 12 scenarios are presented in Table 1 with Table 2 further refining this down to six Growth Options as the employment-led scenarios and those scenarios that would result in low levels of growth have been removed. . As part of the Call for Sites in August and September 2021, Barratt David Wilson Homes submitted the site known as “Land at Llanbedr, Langstone” (CS0052). The submission was comprehensive and included an extensive package of documentation aimed at demonstrating environmental and technical acceptability and performance. Given Barratt David Wilson Homes interest within Newport, the Growth Strategy is only relevant in so much as it informs the housing requirement with matters relating to the number of jobs to be planned (and associated employment land requirement) not of relevance.</p> <p><u>Context</u> National planning policy is clear as to how a housing requirement should be formulated with Paragraph 4.2.6 of Planning Policy Wales Edition 11 (February 2021) stating that: “The latest Welsh Government local authority level Household Projections for Wales, alongside the latest Local Housing Market Assessment (LHMA) and the Well-being plan for a plan area, will form a fundamental part of the evidence base for development plans. These should be considered together with other key evidence in relation to issues such as what the plan is seeking to achieve, links between homes and jobs, the need for affordable housing, Welsh language considerations and the deliverability of the plan, in order to identify an appropriate strategy for the delivery of housing in the plan area. Appropriate</p>	<p>Noted. Candidate Site assessments are being carried out as part of a separate process. The results of the Stage 1 assessment can be found in the Candidate Site’s Register. Stage 2 of the assessment will be published as part of the Preferred Strategy consultation.</p>

<p>consideration must also be given to the wider social, economic, environmental and cultural factors in a plan area in order to ensure the creation of sustainable places and cohesive communities.”</p> <p>From the above text it is clear that:</p> <ol style="list-style-type: none"> 1. Household projections should be used as the starting point for establishing the housing requirement; but that 2. Other elements of the evidence base should also underpin the housing requirement; and that also 3. The wider political, economic, social, and environmental context, combined with what the Local Planning authority (LPA) want the Replacement Local Development Plan (RLDP) to achieve, should be considered. 	
<p><u>Point 1 – Household Projections</u></p> <p>Barratt David Wilson Homes suggest that the correct projection to use is the WG-2018-HIGHPOP (Growth Option 2). The reason for this is that, unlike the WG-2018-Principal or the WG-2018-LOWPOP projections, it is re-based to the 2021 Census.</p> <p>This is the right starting point because it makes use of the most recent set of household projections (2018-based) whilst responding to the actual findings of the 2021 Census which provide an incredibly accurate snapshot in time that is more recent than the 2018-based projections. Put another way, it reflects the actual position on the ground, and the projections associated with it, at a fixed point in time rather than a wholly projected scenario.</p> <p>This is particularly important in the case of Newport City Council (NCC) where there is a significant under estimation of the position compared to the actual findings of the 2021 Census. This is articulated in the “RLDP Demographics” Paper prepared by Edge Analytics on behalf of Newport City Council which at paragraph 2.25 states that:</p> <p>Newport has seen the largest population increase between the 2020 MYE and 2021 Census population compared to other Welsh authorities (2.0%) (Figure 20). Only two out of the 22 Welsh authorities have seen an increase between the two population figures (Powys and Newport), with the rest of the authorities showing population declines.”</p> <p>Taking the above together, it would be the right approach for LPAs, in general, to use the WG-2018-HIGHPOP going forward and this is particularly important for an LPA such as NCC where there is a significant diversion between the 2018-based projections and the 2021 Census.</p>	<p>Noted. The Growth Option taken forward is discussed in detail in the Preferred Strategy Cabinet Paper, the Preferred Strategy Consultation Paper and associated Background Papers.</p>
<p><u>Point 2 – Evidence Base Elements</u></p> <p>Two of the options presented in Table 2 of the Growth and Spatial Options Document are the PG-Short Term and PG-Long Term scenarios (the PG-Long Term is also presented as a Growth Option in Table 2). These scenarios use the ONS 2020 Mid-Year Estimate and then calibrate either to assume migration rates over the last five years (in the case of the PG-Short Term) or 19 years (PG-Long Term).</p> <p>The below table has been put together using the ONS’ “Local Area Migration Indicators” dataset from September 2021 and shows the net balance of inflow and outflow over the last ten years to and from</p>	<p>Noted. The Growth Option taken forward is discussed in detail in the Preferred Strategy Cabinet Paper, the Preferred Strategy Consultation Paper and associated Background Papers. To be passed to Edge for further consideration.</p>

Newport from other parts of the UK. In this case, it is calculated by subtracting the number of people that leave NCC to move to another local authority from the number of people that move to NCC from another local authority:

Year - Net Internal Inflow 2010-2011 90

2011-2012 -197

2012-2013 -357

2013-2014 -485

2014-2015 -11

2015-2016 271

2016-2017 1098

2017-2018 1211

2018-2019 445

2019-2020 1118

The table shows a changing balance over the last 10 years, from a period where there was a net outflow of people from Newport to a situation since 2015-2016 where there has been a sustained and significant net inflow of people from Newport. Assuming a household size of 2.3 people, the net inflow would represent an additional 486 homes per annum for 2019/2020. The 2018/2019 figure is an anomaly as a result of COVID19 - something that is recognised in Paragraph 2.15 of the "LDP Demographics" Paper.

The "LDP Demographics" Paper prepared by Edge Analytics explains why it is the case that there has been a net inflow since 2015/2016 at Paragraph 2.14 which states that:

"Likely factors driving this increase include the rate at which new homes have been built, the removal of the Severn Bridge toll in 2018 and the introduction of ONS' Higher Education Leavers Methodology (HELM)."

The fact that this the greatest net inflow is from Bristol, North Somerset, and South Gloucestershire (Figures 14 and 15 of the LDP Demographics Paper) helps to confirm this conclusion

The position with regards to the Severn Bridge tolls is fixed - the tolls have been removed and there is no indication of them being re-introduced. There is therefore no structural reason as to why the net inflow of people would reverse in coming years.

Barratt David Wilson Homes do not suggest it would be the right approach for either of the PG scenarios to be chosen as a Growth Option as ultimately they look at previous trends rather than future projections to come over the RLDP plan period, but it is clear that the level of UK based migration is such that a significant uplift on the selected demographic scenario should be applied and that this should be based on a PG option that considers the level of net internal migration over the last four years since the tolls have been removed (excluding the year effected by the COVID19 pandemic) rather than a longer time window. This should be applied as a "multiplier" on top of Growth Option 2.

<p><u>Point 3 - Wider Political, Economic, Social, and Environmental Context</u></p> <p>The main document that sets out how Newport should be seen in the context of the wider South East Wales region is Future Wales: The National Plan 2040. The status of Future Wales and what it means for Newport is set out in Section 2.1 of the Growth and Spatial Options document.</p> <p>There's no need to repeat what is said in either document here but it is clear from Policy 33 (National Growth Areas – Cardiff, Newport, and The Valleys) that Newport should:</p> <ul style="list-style-type: none"> • Have an increased strategic role for sustainable long term growth, • Be a growth pole for new housing in the eastern part of South East Wales; and • Work alongside neighbouring authorities (both in South East Wales and England) to achieve this <p>The implications of this are that any Growth Option selected must be aspirational and this is recognised in Section 3.1 of the Growth and Spatial Options document which, on Page 12, explains that a number of the options suggested in Table 1 have been dismissed due to their low scale of growth not being in conformity with Future Wales.</p> <p>The status of Newport in Future Wales is such that there is further justification for the selection of Growth Option 2 as a starting point given that it is aspirational in nature whilst the encouragement to work with neighbouring local authorities suggests that net inflow into Newport from neighbouring authorities should be welcomed and planned for through the incorporation of a PG scenario.</p>	<p>Noted. The Growth Option taken forward is discussed in detail in the Preferred Strategy Cabinet Paper, the Preferred Strategy Consultation Paper and associated Background Papers.</p>
<p><u>Assessment of Growth Options Against RLDP Objectives</u></p> <p>Appendix A of the Growth and Spatial Options Document provides an appraisal of the performance of the six Growth Options against the 10 RLDP Objectives, in essence allowing to create a matrix that allows for comparison between the various options. This is built upon further in Appendix A of the Document.</p> <p>Barratt David Wilson Homes' concern is that the assessment undertaken as part of Table 3 and in Appendix A assumes that a certain Growth Option will have an "Amber" or even "Red" impact when the selection of appropriate sites which are environmentally and technically acceptable (or incorporate appropriate mitigation, compensation, and enhancement to achieve this) can mean that they can be delivered without a negative impact (i.e. with a "Green" or, at worst, "Amber" impact).</p> <p>In this sense, it is essential to stress that the comprehensive submissions that Barratt David Wilson Homes as part of the Call for Sites demonstrated that CS0052 – Land at Llanbedr, Langstone could be delivered in a way which is technically and environmentally sound such that the performance against many of these objectives could instead be considered to be "Green" in this context.</p>	<p>Noted. This assessment was produced for the purpose of the Growth and Spatial Options consultation, however the Integrated Sustainability Appraisal (ISA) assesses these in more detail.</p> <p>Candidate Site assessments are being carried out as part of a separate process. The results of the Stage 1 assessment can be found in the Candidate Site's Register. Stage 2 of the assessment will be published as part of the Preferred Strategy consultation.</p>
<p><u>Extent of Flexibility Allowance</u></p> <p>Paragraph 5.58 of Edition 3 the Development Plans Manual (March 2020) is clear that there is a requirement for a flexibility allowance to be added on top of the housing requirement to derive the number of homes than RLDP should plan for. This is in the interest of ensuring that sufficient housing is delivered when some allocated sites either are not delivered or deliver less home than anticipated.</p>	<p>Noted, the Preferred Strategy Cabinet Paper, the Preferred Strategy Consultation Paper and associated background papers provide greater detail on this.</p>

<p>Paragraph 5.59 of Edition 3 the Development Plans Manual is clear that the extent of the flexibility allowance should be informed by local issues with 10% as a starting point (i.e. as the minimum). Barratt David Wilson Homes recognise that the extent of the flexibility allowance will be determined considerably later in the RLDP preparation stage, likely at Deposit stage and that it is inappropriate to comment too much on this at this time.</p> <p>That said, Indicator OB4 MT3 of the Annual Monitoring Report (October 2022) for the period from April 2021 to April 2022 recognised a cumulative shortfall in housing delivery against the LDP's housing trajectory. Historic performance against this indicator is presented in the table below:</p> <p>Year % Delivery Against Cumulative Required Rates</p> <p>2015 -5% 2016 3% 2017 -2% 2018 -6% 2019 -9% 2020 -12% 2021 -14</p> <p>Importantly, this is against the housing requirement of 10,350 homes and not the 11,623 homes that the adopted LDP plans for. In essence, in 2021 where the rate is a -14% rate, this is 14% below the housing requirement but 26% below the number of homes that were planned for which incorporated the 12% buffer in the adopted LDP.</p> <p>Even at this stage it is clear from the above that the 12% buffer in the adopted LDP is entirely inadequate and a greater buffer should be incorporated for the RLDP</p>	
<p><u>Conclusion</u></p> <p>Taking the above together Barratt David Wilson Homes suggest that Growth Option 2 should be used as the starting point but should be enhanced to reflect the higher levels of net inflow into Newport in recent years and Newport's significance to the South East Wales region in Future Wales. Whilst for consideration in subsequent consultations, a greater flexibility should be applied on top of the housing requirement than that in the adopted LDP.</p>	<p>Noted, the Preferred Strategy Cabinet Paper, the Preferred Strategy Consultation Paper and associated background papers provide greater detail on this.</p>
<p>SPATIAL OPTIONS:</p> <p>8. Which of these options do you feel is the most appropriate, and why?</p> <p>9. Are there any other spatial distributions that should considered, and if so, why?</p> <p>10. Are there any other matters that should be given consideration when assessing these?</p>	
<p><u>Background and Policy Context</u></p> <p>Chapter 4 of the Growth and Spatial Options Document presents four Spatial Options as to how the requirements outlined in Chapters 2 and 3 should be distributed spatially. Four options are presented -</p>	<p>Noted</p>

one which would be to focus new housing on previously developed land, a second which would be to focus on a series of greenfield allocations on the edge of the urban boundary, a third of directing growth to nine identified villages, and a fourth which is a hybrid of the previous three options.

Paragraph 3.44 of Planning Policy Wales Edition 11 (February 2021) provides guidance as to how the site search sequence should be undertaken when identifying residential allocations, stating that:

"Where there is a need for sites, but it has been clearly demonstrated that there is no previously developed land or underutilised sites (within the authority or neighbouring authorities), consideration should then be given to suitable and sustainable greenfield sites within or on the edge of settlements. The identification of sites in the open countryside, including new settlements, must only be considered in exceptional circumstances and subject to the considerations above and paragraph 3.50 below."

Commentary on Reliance on Previously Developed Land Approach

Whilst there is no doubt that the delivery of previously developed land (PDL) is prioritised in national planning policy, the Growth and Spatial Options Document recognises that there is not going to be sufficient previously developed land available for the continuation of the PDL-led approach taken in the adopted LDP. The first paragraph of Section 5 of Document is clear on this, stating that:

"While the merits of continuing this strategy are understood, there is some concern that previously developed land is a finite resource and the availability of sites may not be as buoyant as it was or the reuse of land for housing may require the de- allocation of some employment sites."

On this basis, the selection of the PDL-led Spatial Option is not going to be sufficient to meet the higher Growth Options (and importantly the Growth and Spatial Options paper discounts the lower Growth Options).

There is also a wider point as to whether reliance on a PDL-led strategy is a sufficiently robust Spatial Strategy to ensure that the housing requirement is delivered in full. The adopted LDP relies on a PDL-led strategy and, as set out in connection to the flexibility allowance for the Growth Options questions, this has resulted in a significant shortfall of housing delivery compared to the housing trajectory. Analysis from the Annual Monitoring Report (October 2022) for the period from April 2021 to April 2022 shows that there are 1,189 (equating to 11.5% of the total housing requirement) units that the adopted LDP anticipated to be delivered on brownfield sites in the adopted LDP plan period but now are not expected to be delivered prior to its end date in 2026.

From the above, it is clear that there is not enough PDL land for the implementation of a PDL-led Spatial Strategy and that, even if there was, the implementation of a PDL-led approach would likely result in a shortfall in delivery against requirement.

Barratt David Wilson Homes therefore suggest that:

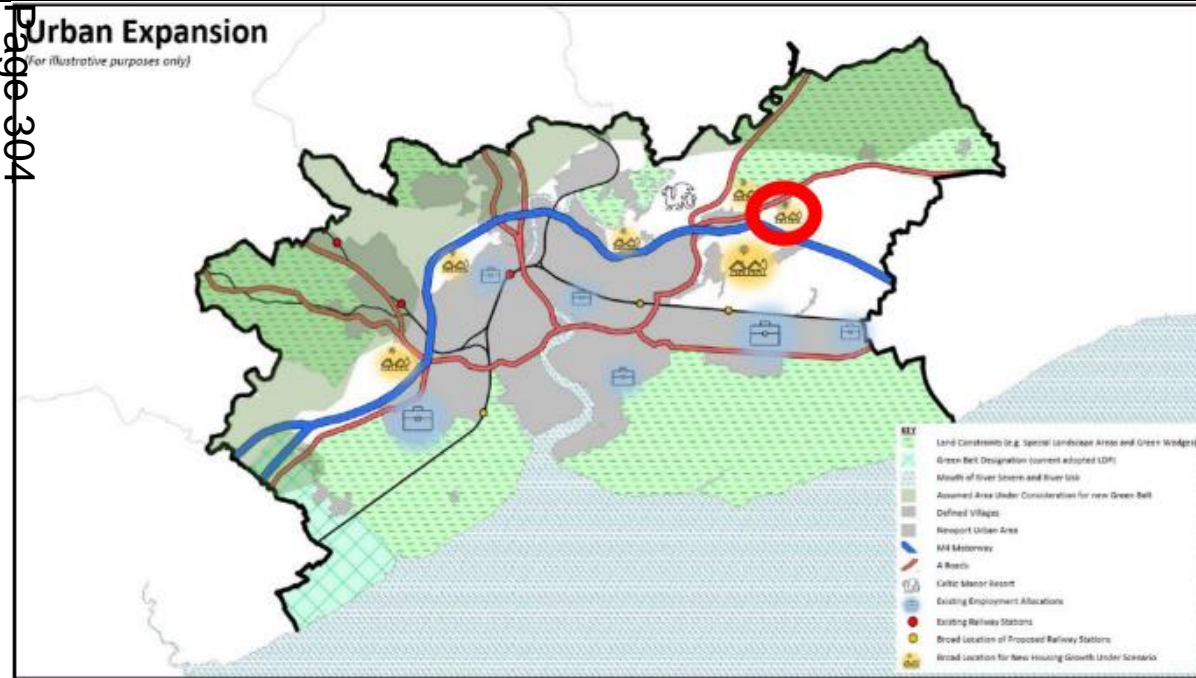
-Any PDL allocations in the adopted LDP where development has not commenced should continue to be supported through a positive allocation but should not be relied upon to meet the housing requirement;

-No PDL allocations should be made on sites with capacity for less than 50 homes. These should be allowed to come forward as windfall sites; and
 -New PDL allocations in excess of 50 homes that are counted towards meeting the housing requirement should only be made where it has been demonstrated that these are available and viable.

Suggested Approach

The higher Growth Options (including the modified Option 2 that Barratt David Wilson Homes are suggesting) that are set out in the Growth and Spatial Options Document are unlikely to be able to be met in their entirety through either the “Village Focus” Spatial Option or the “Urban Expansion” option and therefore it is suggested that the “Hybrid” Spatial Option is really the only suitable Spatial Option that can deliver the higher Growth Options that are suggested and continue to perform strongly against the RLDP’s objectives. As part of this, it is essential that the “Hybrid” Spatial Option directs new housing to the most appropriate locations which, for the reasons set out below, should include Langstone. As part of the “Hybrid” Spatial Option which is supported by Barratt David Wilson Homes, there will be a requirement for a number of greenfield extensions to Newport and its surrounding settlements and it is positive to see that the illustrative diagram for the “Urban Expansion” Spatial Option specifically identifies Langstone (as circled in red below) as a “Broad Location for New Growth Under Scenario”.

Noted. The Spatial Option taken forward is discussed in detail in the Preferred Strategy Cabinet Paper, the Preferred Strategy Consultation Paper and associated Background



<p>Whilst it is recognised that these diagrams are wholly illustrative and do not allow identification of specific sites, Barratt David Wilson Homes support the identification of Langstone as an appropriate location for new housing and, whilst this is specifically in connection to the “Urban Expansion” Spatial Option, it is logical that the same conclusion can be reached for the “Hybrid” Spatial Option given that it inherently will include urban extensions.</p> <p>Langstone is considered a highly suitable for location for new housing as part of a Hybrid Spatial Option for the following reasons:</p> <ul style="list-style-type: none"> • It is largely free from fundamental constraints in that it is largely free from flood risk, is outside of the “Assumed Area Under Consideration for New Green Belt”, is not washed over by, and is generally distant from, significant landscape, ecological and heritage designations, • As demonstrated in the Transport Assessment (prepared by Lime Transport) submitted as part of the Call for Sites, Langstone is a sustainable location which is well-connected to local bus routes and contains a mix of local services; and • It would add to the range and choice of housing supply locally in a context where the adopted LDP did not make new housing allocations within Langstone (instead only creating a positive planning context for a series of existing housing commitments which have now been fully delivered). <p>Whilst clearly this consultation is not focussed on assessing individual sites such that they can be allocated, Barratt David Wilson Homes would emphasise the fundamental suitability of CS0052 – Land at Langstone to accommodate new housing in Langstone.</p>	
<p><u>Conclusion</u></p> <p>Barratt David Wilson Homes recognise the “Hybrid” Spatial Option to be the only approach that can realistically be relied upon to deliver the housing requirement. That said, the approach needs to focus growth in those locations where it is appropriate and, for the reasons above, it is suggested that Langstone is one of those.</p>	<p>The Deposit Plan will include a review of the urban and village boundaries.</p>

GSO 060 - Redrow Homes (South Wales) Limited Great Milton Park - 00640

Question / Response	Officer Response
<p>We write on behalf of our client, Redrow Homes (South Wales) Ltd (‘the client’), to provide a response to Newport City Council’s (NCC) Growth and Spatial Options consultation in preparation of the Replacement Local Development Plan (RLDP) 2021-2036, in respect of their land interests at Land south west of Great Milton Park, Llanwern (see site location plan at Appendix A).</p> <p>The above site was promoted through the Council’s previous Call for Candidate Sites consultation for residential-led development in August 2021. Further details on the above site and our response to the Council’s Growth and Spatial Options Paper, subject of this consultation, are set out further in this letter.</p>	<p>Candidate Site assessments are being carried out as part of a separate process. The results of the Stage 1 assessment can be found in the Candidate Site’s Register. Stage 2 of the assessment will be published as part of the Preferred Strategy consultation.</p>

Growth Options

The Council has identified several growth options which are to be tested to determine the most suitable and sustainable strategy for housing and employment growth up to 2036. The testing of a range of growth scenarios was commissioned independently by the Council, incorporating the latest demographic evidence (including the initial 2021 Census results), to assist with their assessment of the appropriate level of growth for the city

The findings of The LDP Demographics report (September 2022), prepared as evidence base to support the emerging RLDP, shows that over the plan period Newport will experience population growth of between 4% and 14.9% (as estimated under the range of scenarios tested).

On a regional basis, the population of the Cardiff Capital Region (which includes Newport) is ageing, and it is likely that a quarter of the population will be aged over 65 years old by 2039. As such, the available workforce is shrinking, and the city of Cardiff is projected to be the only local authority in the region with a growing population aged 16-64 between now and 2039. Consequently, the Cardiff Capital Region City Deal is looking to create an additional 25,000 new jobs within the region.

A significant increase in the level of housing planned within the region is required in order to underpin the economic aspirations and opportunity provided by the City Deal.

The consultation paper acknowledges that when considering all eleven growth scenarios, some of these were deemed unreasonable and therefore discounted from assessment against the Integrated Sustainability Appraisal (ISA). The employment-led scenarios tended to result in a negative need for employment land over the plan period with outputs much lower than the adopted growth strategy. The consultation document also sets out that where scenarios have been assessed and result in a low scale of growth, these have been discounted from further assessment as they did not align with Newport's focus for growth.

Future Wales: The National Plan 2040, identifies Newport within a National Growth Area which will be the main focus for growth and investment in the south east region (Policy 33). The Welsh Government supports an increased strategic role for Newport as a focus for sustainable long-term growth and investment. The Council's strategy to discount any scenario that resulted in a low scale of growth is therefore strongly supported given that this complies with national policy and continues to support the role Newport has to play in delivering growth for the south east region.

The consultation paper also recognises that of the six growth scenarios taken forward for further assessment, these scenarios propose a wide range of potential housing and employment need. However, the Council acknowledges that new jobs need to be supported through housing growth as this is essential in enhancing Newport's economic role within the region and avoiding the need to commute outwards to work. We strongly support the Council's recognition that the delivery of housing is required to support jobs and prevent outwards commuting as for any economic growth strategy it is vital that housing growth underpins jobs growth as one cannot come forward without the other.

Noted. The Growth Option taken forward is discussed in detail in the Preferred Strategy Cabinet Paper, the Preferred Strategy Consultation Paper and associated Background Papers.

<p>We generally support growth options 1 (Dwelling-led 5YR), 2 (WG-2018-HIGHPOP) and 3 (Dwellingled 10YR). These three growth scenarios also perform best against the emerging RLDP objectives of 'Economy and Employment', 'Population and Communities' and 'Health and Wellbeing'. We consider that to deliver against the Welsh Government's requirement for promoting Newport's strategic role, an increase in growth should be attributed to the city. It is also considered that apportioning a greater amount of growth to Newport will help manage the development pressures in the region by providing a strategic growth focus for the eastern part of the south east region, in accordance with the requirements of Future Wales.</p> <p>In addition to directing development towards Newport as a National Growth Area, national policy also requires development to be sustainably located with easy access to public transport and other public services. In accordance with policy, the site which is subject to these representations is suitable for delivering a range and choice of housing (including affordable housing) in a sustainable location on a deliverable site. This can contribute towards the resilience of the RLDP's housing trajectory, the effectiveness of the emerging plan and aid towards defining Newport as a strategic growth area.</p>	
<p>Spatial Options</p>	
<p>The Council's Growth and Spatial Options Paper sets out several spatial options available for supporting the delivery of new growth in Newport up to 2036. One spatial option considered is prioritising the re-use of previously developed land (PDL). Although we do not necessarily oppose this option, it should be recognised that there is a lack of suitable, viable and deliverable brownfield sites within the city. Therefore, the release of greenfield land is required to meet the need for new housing. The greenfield site subject to this consultation response is free of any major constraints and is sustainably located such that it is available and deliverable for residential development.</p> <p>Two alternative options, being 'urban expansion' and 'village focus', are also being considered as spatial options as part of preparing the RLDP. In terms of taking an urban expansion approach, the consultation document explains that this would require the identification of land on the edge of the urban boundary whereas a village focus would constitute directing development towards nine defined villages, including Llanwern. These spatial options are generally supported as targeting development under either approach would see sustainable sites come forward given proximity to existing established settlements and the associated ease of access to public transport and other public services.</p> <p>The site at Land south west of Great Milton Park, Llanwern proposes housing growth in a location well related to Great Milton Park which will provide a range of neighbourhood facilities (such as a school, village centre and Multi-use Games Arena) and therefore demonstrates the holistic approach sought by PPW, which seeks the right development in the right place to achieve sustainable placemaking outcomes. A range and choice of housing can be provided on site. Redrow are committed to creating a place which will be suitable and attractive for new residents, and which will embrace the increasing ability to work</p>	<p>Noted. The Spatial Option taken forward is discussed in detail in the Preferred Strategy Cabinet Paper, the Preferred Strategy Consultation Paper and associated background papers.</p> <p>The Deposit Plan will include a review of the urban and village boundaries. The Settlement Assessment Background Paper provides a village appraisal.</p>

<p>flexibly and from home. As well as providing for a wide mix of house types and sizes, Redrow's home design and digital connectivity ensures that working from home is an attractive option.</p> <p>The site proposes housing in a landscape setting with significant multifunctional green space (comprising circa 55% of the overall development area). Opportunities for local food production through the provision of local grow spaces can be provided along with the provision of children's play facilities and nature walks. The proposal therefore provides the opportunity for existing residents to utilise the open space provided as part of the development to the benefit of the existing community. The site would therefore help create and sustain the community and accord with PPW and Policy 2 of Future Wales.</p> <p>Our client's site is located adjacent to the existing settlement boundary and has the potential to connect the new Great Milton site with the council's own land allocated but not yet developed. A new link will be advantageous in relation to active travel routes and potentially public transport route.</p> <p>The land is also free from any overriding unresolvable physical constraints, including infrastructure and utilities, access, ground conditions, landscape, heritage designations, flood risk issues and pollution. It is not located within a Phosphorus Sensitive Catchment Area and can be delivered early in the plan period to contribute towards the resilience of the RLDP's housing trajectory. It is considered that if the Council adopted an urban expansion or village focus approach, given the site is sustainably located and likely to accord with the parameters and objectives to be set within either approach, allocation of this site would therefore contribute to the soundness of the plan through assisting with its effectiveness.</p> <p>The Council also propose a 'hybrid' spatial option to accommodate future growth. This would include a mix of previously developed land, sites on the edge of urban boundary and sites at surrounding existing villages. This approach is generally more supported over the other spatial options as it provides greater flexibility for allocating the right sites in the right locations to deliver development that addresses local and regional need.</p> <p>Overall, we encourage the Council to ensure that sites allocated for residential use are assessed on a site by site basis. Our client's site is sustainably located, deliverable and considered worthy of allocation in the emerging RLDP. The site is located adjacent to existing development and meets the principles of 'facilitating developments which are sited in the right locations', as advocated by Planning Policy Wales (PPW) (paragraph 4.1.10).</p>	
<p>Evidence Base</p> <p>The LDP Demographics Report states that when considering growth outcomes, it is important to note that they have been developed during a period of unprecedented social and economic upheaval caused by Brexit and the COVID-19 pandemic, the full impacts of which are not currently fully understood. Alongside these factors, the full detailed results of the 2021 Census are expected in late 2022 / early 2023 which will provide an important update to the demographic evidence base for all local authorities. Once this is available, the report recommends that NCC should consider a range of demographic scenarios and updated assumptions informed by more accurate projections. Therefore, depending on</p>	<p>This assessment was produced for the purpose of the Growth and Spatial Options consultation, however the Integrated Sustainability Appraisal (ISA) assesses these in more detail. Updated evidence will be considered as this emerges over the course of the RLDP process.</p>

when the next stage RLDP is published, it is expected that the Council will take into consideration any updates to population and growth predications, and as such, we reserve the right to comment further on any updated figures, once made available.	
Summary	
In summary, we broadly support the growth and spatial options proposed by the Council. We encourage the Council to adopt an approach that allocates the right sites in the right locations as advocated by PPW which can demonstrate that they are suitable, deliverable, and sustainable whilst also positively contributing towards the Council's housing delivery targets and placemaking principles.	Noted
We reserve the right to comment further at the Preferred Strategy stage specifically in relation to the site selection process although we consider our client's site at Llanwern to be sustainably located and deliverable such that it is worthy of allocation in the emerging LDP.	

GSO 061 - Redrow Homes (South Wales) Limited Magor Junction 23A - 00640

Question / Response	Officer Response
<p>We write on behalf of our client, Redrow Homes (South Wales) Ltd ('the client'), to provide a response to Newport City Council's (NCC) Growth and Spatial Options consultation in preparation of the Replacement Local Development Plan (RLDP) 2021-2036, in respect of their land interests at St Brides (Land north of Junction 23A) (see site location plan at Appendix A).</p> <p>The above site was promoted through the Council's previous Call for Candidate Sites consultation for Residential-led development in August 2021. Further details on the above site and our response to the Council's Growth and Spatial Options Paper, subject of this consultation, are set out further in this letter.</p>	<p>Candidate Site assessments are being carried out as part of a separate process. The results of the Stage 1 assessment can be found in the Candidate Site's Register. Stage 2 of the assessment will be published as part of the Preferred Strategy consultation.</p>
<p>Growth Options</p> <p>The Council has identified several growth options which are to be tested to determine the most suitable and sustainable strategy for housing and employment growth up to 2036. The testing of a range of growth scenarios was commissioned independently by the Council, incorporating the latest demographic evidence (including the initial 2021 Census results), to assist with their assessment of the appropriate level of growth for the city.</p> <p>The findings of The LDP Demographics report (September 2022), prepared as evidence base to support the emerging RLDP, shows that over the plan period Newport will experience population growth of between 4% and 14.9% (as estimated under the range of scenarios tested).</p> <p>On a regional basis, the population of the Cardiff Capital Region (which includes Newport) is ageing, and it is likely that a quarter of the population will be aged over 65 years old by 2039. As such, the available workforce is shrinking, and the city of Cardiff is projected to be the only local authority in the region with</p>	<p>Noted. The Growth Option taken forward is discussed in detail in the Preferred Strategy Cabinet Paper, the Preferred Strategy Consultation Paper and associated Background Papers.</p>

a growing population aged 16-64 between now and 2039. Consequently, the Cardiff Capital Region City Deal is looking to create an additional 25,000 new jobs within the region.

A significant increase in the level of housing planned within the region is required in order to underpin the economic aspirations and opportunity provided by the City Deal.

The consultation paper acknowledges that when considering all eleven growth scenarios, some of these were deemed unreasonable and therefore discounted from assessment against the Integrated Sustainability Appraisal (ISA). The employment-led scenarios tended to result in a negative need for employment land over the plan period with outputs much lower than the adopted growth strategy. The consultation document also sets out that where scenarios have been assessed and result in a low scale of growth, these have been discounted from further assessment as they did not align with Newport's focus for growth.

Future Wales: The National Plan 2040, identifies Newport within a National Growth Area which will be the main focus for growth and investment in the south east region (Policy 33). The Welsh Government supports an increased strategic role for Newport as a focus for sustainable long-term growth and investment. The Council's strategy to discount any scenario that resulted in a low scale of growth is therefore strongly supported given that this complies with national policy and continues to support the role Newport has to play in delivering growth for the south east region.

The consultation paper also recognises that of the six growth scenarios taken forward for further assessment, these scenarios propose a wide range of potential housing and employment need. However, the Council acknowledges that new jobs need to be supported through housing growth as this is essential in enhancing Newport's economic role within the region and avoiding the need to commute outwards to work. We strongly support the Council's recognition that the delivery of housing is required to support jobs and prevent outwards commuting as for any economic growth strategy it is vital that housing growth underpins jobs growth as one cannot come forward without the other.

We generally support growth options 1 (Dwelling-led 5YR), 2 (WG-2018-HIGHPOP) and 3 (Dwellingled 10YR). These three growth scenarios also perform best against the emerging RLDP objectives of 'Economy and Employment', 'Population and Communities' and 'Health and Wellbeing'. We consider that to deliver against the Welsh Government's requirement for promoting Newport's strategic role, an increase in growth should be attributed to the city. It is also considered that apportioning a greater amount of growth to Newport will help manage the development pressures in the region by providing a strategic growth focus for the eastern part of the south east region, in accordance with the requirements of Future Wales.

In addition to directing development towards Newport as a National Growth Area, national policy also requires development to be sustainably located with easy access to public transport and other public services. In accordance with policy, the site which is subject to these representations is suitable for delivering a range and choice of housing (including affordable housing) in a sustainable location on a

<p>deliverable site. This can contribute towards the resilience of the RLDP’s housing trajectory, the effectiveness of the emerging plan and aid towards defining Newport as a strategic growth area.</p>	
<p>Spatial Options</p> <p>The Council’s Growth and Spatial Options Paper sets out several spatial options available for supporting the delivery of new growth in Newport up to 2036. One spatial option considered is prioritising the re-use of previously developed land (PDL). Although we do not necessarily oppose this option, it should be recognised that there is a lack of suitable, viable and deliverable brownfield sites within the city. Therefore, the release of greenfield land is required to meet the need for new housing. The greenfield site subject to this consultation response is free of any major constraints and is sustainably located such that it is available and deliverable for residential development.</p> <p>Two alternative options, being ‘urban expansion’ and ‘village focus’, are also being considered as spatial options as part of preparing the RLDP. In terms of taking an urban expansion approach, the consultation document explains that this would require the identification of land on the edge of the urban boundary whereas a village focus would constitute directing development towards nine defined villages. These spatial options are generally supported as targeting development under either approach would see sustainable sites come forward given proximity to existing established settlements and the associated ease of access to public transport and other public services.</p> <p>The Council also propose a ‘hybrid’ spatial option to accommodate future growth. This would include a mix of previously developed land, sites on the edge of urban boundary and sites at surrounding existing villages. This approach is generally more supported over the other spatial options as it provides greater flexibility for allocating the right sites in the right locations to deliver development that addresses local and regional need.</p> <p>We recommend that a hybrid approach should also include the allocation of strategic sites which have the ability to create new cohesive communities, deliver on-site green infrastructure, create high quality employment uses and deliver a range and choice of housing for all sectors of the population, including affordable homes for local people.</p> <p>The Cardiff Capital Region Strategic Business Plan, which has been prepared and endorsed by the ten local authorities within the region, identifies that:</p> <p>“The housing shortfall of the region, linked to the future economic aspirations of the Regional Cabinet, is being full explored and detailed as an expression of ‘need’... [the Regional Cabinet will] promote access to a range of housing, including affordable... Having a range of housing choice can stimulate latent housing markets, with long term benefits to communities.”</p> <p>The Authorities, through the Cabinet’s City Deal, specifically endorse that:</p> <p>“In some parts of the region there is potential to explore the development of new settlements (settlements of the future) which would combine housing, employment, education and leisure elements in a planned, sustainable development of significant scale” (empha sis added)</p>	<p>Noted. The Spatial Option taken forward is discussed in detail in the Preferred Strategy Cabinet Paper, the Preferred Strategy Consultation Paper and associated background papers.</p> <p>The Deposit Plan will include a review of the urban and village boundaries.</p>

It is considered that a new settlement in this location – by way of providing consistency of housing supply over a prolonged period in addition to a mix and range of employment and supporting community uses - can play an essential role in addressing the above issues.”

Our client’s site at St Bride’s (Land north of Junction 23A) is proposed as a new settlement to accommodate residential-led development within the city. This site is considered to be sustainably located, presents no ‘in principle’ constraints to preclude development and would contribute to the soundness of the emerging plan. The RLDP needs to be underpinned by a choice and range of immediately available sites in order to ensure continuity of housing supply throughout the plan period. Therefore, adopting a hybrid approach which includes allocating smaller, readily available sites to deliver housing in the short-medium term and strategic sites to a range of homes are delivered in the medium-long term will ensure a strong and consistent housing trajectory.

The site provides the opportunity to facilitate the proposed railway station at Magor (as identified as part of the South Wales Metro proposals). The proposal is for a community “Walkway” station as the site is within ten to fifteen minutes walking distance of the entire population of Magor and Undy (population 6-7,000) and sits perfectly with the recent Active Travel (Wales) Act 2013. The intention is to integrate the railway station as a valuable part of the social fabric of the community so that it is not seen as a piece of infrastructure on the fringe of the community only used for a few hours a day.

The development of a new settlement will have the potential to generate additional support, accelerate and even help fund this process through increasing the critical mass and catchment of potential rail users for the new station.

In addition, there are improvement proposals at Severn Tunnel junction including further parking for customers and improved walking and cycling linkages for patrons. The eastern part of the proposed land ownership is between 1.5-2km from this station.

Additionally, plans for a new £50million railway station and 1,000 car park space park and ride facility are being progressed to the west of the site at Llanwern. The proposed station is located within a 30 minute cycling isochrone of the proposed new settlement at St Brides.

Whilst the abolishment of the Severn Bridge tolls occurred at the end of 2018, its wider effect on the of the economy Authority area, commuting patterns, housing demand, housing need and housing requirement should not be underestimated. In this regard, the Welsh Government commissioned a report on ‘The Impact of the Severn Tolls on the Welsh Economy’ (Arup, May 2012) which states: “It is likely that reducing the toll regime would increase the housing market pressure to the South of the county driven by commuters to Bristol and South Gloucestershire.” (Page 61)

The West of England Joint Spatial Plan Topic Paper 8 relating to transport identifies that:

“The removal of tolls on the Severn Crossings from the end of 2018 is forecast to result in a large increase in traffic using the crossings due to increased economic activity and greater commuting between the two sides of the estuary.”

<p>The mixed-use proposals at the site provide an opportunity to support and underpin increased economic activity.</p> <p>As previously referenced, there is moreover a pressing need for the economic aspirations of the wider city-region, not least through the Cardiff Capital Region City Deal, to align with the level of housing provision within the city.</p> <p>The allocation of the site would accordingly contribute to the soundness of the Plan through ensuring that it 'fits' and is consistent with other wider plans and initiatives.</p> <p>Overall, we encourage the Council to ensure that sites allocated for residential use are assessed on a site by site basis. Our client's site is sustainably located, deliverable and considered worthy of allocation in the emerging RLDP. The site is located adjacent to existing development and meets the principles of 'facilitating developments which are sited in the right locations', as advocated by Planning Policy Wales (PPW) (paragraph 4.1.10).</p>	
<p>Evidence Base</p> <p>The LDP Demographics Report states that when considering growth outcomes, it is important to note that they have been developed during a period of unprecedented social and economic upheaval caused by Brexit and the COVID-19 pandemic, the full impacts of which are not currently fully understood. Alongside these factors, the full detailed results of the 2021 Census are expected in late 2022 / early 2023 which will provide an important update to the demographic evidence base for all local authorities. Once this is available, the report recommends that NCC should consider a range of demographic scenarios and updated assumptions informed by more accurate projections. Therefore, depending on when the next stage RLDP is published, it is expected that the Council will take into consideration any updates to population and growth predications, and as such, we reserve the right to comment further on any updated figures, once made available.</p>	<p>This assessment was produced for the purpose of the Growth and Spatial Options consultation, however the Integrated Sustainability Appraisal (ISA) assesses these in more detail. Updated evidence will be considered as this emerges over the course of the RLDP process.</p>
<p>Summary</p> <p>In summary, we broadly support the growth and spatial options proposed by the Council. We encourage the Council to adopt an approach that allocates the right sites in the right locations as advocated by PPW which can demonstrate that they are suitable, deliverable, and sustainable whilst also positively contributing towards the Council's housing delivery targets and placemaking principles.</p>	<p>Noted</p>

GSO 062 - Redrow Homes (South Wales) Limited Pentre-poeth- 00640

<p>GROWTH OPTIONS: Growth Scenarios –</p> <ol style="list-style-type: none"> 1. Are there any scenarios that have been discounted which should be considered further, and why? 2. Which of the options do you feel is the most appropriate, and why? Assessment of Growth Options Against RLDP Objectives – 3. Are there any other matters that should be taken account of when assessing these scenarios and identifying a Preferred Strategy?
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The Council has identified several growth options which are to be tested to determine the most suitable and sustainable strategy for housing and employment growth up to 2036. The testing of a range of growth scenarios was commissioned independently by the Council, incorporating the latest demographic evidence (including the initial 2021 Census results), to assist with their assessment of the appropriate level of growth for the city.

The findings of The LDP Demographics report (September 2022), prepared as evidence base to support the emerging RLDP, shows that over the plan period Newport will experience population growth of between 4% and 14.9% (as estimated under the range of scenarios tested).

On a regional basis, the population of the Cardiff Capital Region (which includes Newport) is ageing, and it is likely that a quarter of the population will be aged over 65 years old by 2039. As such, the available workforce is shrinking, and the city of Cardiff is projected to be the only local authority in the region with a growing population aged 16-64 between now and 2039. Consequently, the Cardiff Capital Region City Deal is looking to create an additional 25,000 new jobs within the region.

A significant increase in the level of housing planned within the region is required in order to underpin the economic aspirations and opportunity provided by the City Deal.

The consultation paper acknowledges that when considering all eleven growth scenarios, some of these were deemed unreasonable and therefore discounted from assessment against the Integrated Sustainability Appraisal (ISA). The employment-led scenarios tended to result in a negative need for employment land over the plan period with outputs much lower than the adopted growth strategy. The consultation document also sets out that where scenarios have been assessed and result in a low scale of growth, these have been discounted from further assessment as they did not align with Newport's focus for growth.

Future Wales: The National Plan 2040, identifies Newport within a National Growth Area which will be the main focus for growth and investment in the south-east region (Policy 33). The Welsh Government supports an increased strategic role for Newport as a focus for sustainable long-term growth and investment. The Council's strategy to discount any scenario that resulted in a low scale of growth is therefore strongly supported given that this complies with national policy and continues to support the role Newport has to play in delivering growth for the south-east region.

The consultation paper also recognises that of the six growth scenarios taken forward for further assessment, these scenarios propose a wide range of potential housing and employment need. However, the Council acknowledges that new jobs need to be supported through housing growth as this is essential in enhancing Newport's economic role within the region and avoiding the need to commute outwards to work. We strongly support the Council's recognition that the delivery of housing is required to support jobs and prevent outwards commuting as for any economic growth strategy it is vital that housing growth underpins jobs growth as one cannot come forward without the other.

Candidate Site assessments are being carried out as part of a separate process. The results of the Stage 1 assessment can be found in the Candidate Site's Register. Stage 2 of the assessment will be published as part of the Preferred Strategy consultation.

<p>We generally support growth options 1 (Dwelling-led 5YR), 2 (WG-2018-HIGHPOP) and 3 (Dwelling-led 10YR). These three growth scenarios also perform best against the emerging RLDP objectives of 'Economy and Employment', 'Population and Communities' and 'Health and Wellbeing'. We consider that to deliver against the Welsh Government's requirement for promoting Newport's strategic role, an increase in growth should be attributed to the city. It is also considered that apportioning a greater amount of growth to Newport will help manage the development pressures in the region by providing a strategic growth focus for the eastern part of the south-east region, in accordance with the requirements of Future Wales.</p> <p>In addition to directing development towards Newport as a National Growth Area, national policy also requires development to be sustainably located with easy access to public transport and other public services. In accordance with policy, the site which is the subject of this representation is suitable for delivering a range and choice of housing (including affordable housing) in a sustainable location adjacent to the settlement boundary of Newport at Bassaleg. The previous UDP Inspector also found this area of Newport suitable for growth. This can contribute towards the resilience of the RLDP's housing trajectory, the effectiveness of the emerging plan and aid towards defining Newport as a strategic growth area.</p>	
<p>SPATIAL OPTIONS:</p> <p>8. Which of these options do you feel is the most appropriate, and why?</p> <p>9. Are there any other spatial distributions that should be considered, and if so, why?</p> <p>10. Are there any other matters that should be given consideration when assessing these?</p>	
<p><u>Spatial Options</u></p> <p>The Council's Growth and Spatial Options Paper sets out several spatial options available for supporting the delivery of new growth in Newport up to 2036. One spatial option considered is prioritising the re-use of previously developed land (PDL). Although we do not necessarily oppose this option, it should be recognised that there is a lack of suitable, viable and deliverable brownfield sites within the city. Therefore, the release of greenfield land is required to meet the need for new housing. The greenfield site which is the subject to this consultation response is free of any major constraints and is sustainable located adjacent to the settlement boundary of Bassaleg such that the site is available and deliverable for residential development.</p> <p>An urban expansion option is being considered as part of preparing the RLDP. In terms of taking an urban expansion approach, the consultation document explains that this would require the identification of land on the edge of the urban boundary which is generally supported.</p> <p>In terms of the village option, Bassaleg is not listed as a village but under the hybrid option, the supporting text states that the hybrid approach would include a mix of previously development land, sites on the edge of the urban boundary and sites at surrounding existing villages. Should the village option being take forward by the Council, then Bassaleg should also be identified as an existing village. Should this change be made then we would be generally supportive of this option.</p>	<p>Noted. The Spatial Option taken forward is discussed in detail in the Preferred Strategy Cabinet Paper, the Preferred Strategy Consultation Paper and associated background papers.</p> <p>The Deposit Plan will include a review of the urban and village boundaries.</p>

<p>The Council also propose a ‘hybrid’ spatial option to accommodate future growth. This would include a mix of previously developed land, sites on the edge of urban boundary and sites at surrounding existing villages. This approach is generally more supported over the other spatial options as it provides greater flexibility for allocating the right sites in the right locations to deliver development that addresses local and regional need.</p> <p>Our site ‘Land at Pentre-poeth’ is located adjacent to the existing settlement boundary and is free from any overriding unresolvable physical constraints, including infrastructure and utilities, access, ground conditions, landscape, heritage designations, flood risk issues and pollution. The site is also not located within a Phosphorus Sensitive Catchment Area and can be delivered early in the plan period to contribute towards the resilience of the RLDP’s housing trajectory. Given the site is sustainably located and accords with the objectives of the emerging RLDP, the allocation of the site would therefore contribute to the soundness of the plan through assisting with its effectiveness.</p> <p>Overall, we encourage the Council to ensure that sites allocated for residential use are assessed on a site by site basis. Our site is sustainably located, deliverable and considered worthy of allocation in the emerging RLDP. The site is located adjacent to the existing settlement boundary and meets the principles of ‘facilitating developments which are sited in the right locations’, as advocated by Planning Policy Wales (PPW) (paragraph 4.1.10).</p>	
<p>EVIDENCE BASE:</p> <p>Q1. Are there any other pieces of evidence that you believe should inform the development of the preferred growth and spatial options strategies?</p> <p>Q2. Are there any other comments you’d like to make regarding anything within this consultation document? Do you agree with the Objectives for the RLDP? If not, how and why do you think they should be changed?</p>	
<p>Evidence Base</p> <p>The LDP Demographics Report states that when considering growth outcomes, it is important to note that they have been developed during a period of unprecedented social and economic upheaval caused by Brexit and the COVID-19 pandemic, the full impacts of which are not currently fully understood. Alongside these factors, the full detailed results of the 2021 Census are expected in late 2022 / early 2023 which will provide an important update to the demographic evidence base for all local authorities. Once this is available, the report recommends that NCC should consider a range of demographic scenarios and updated assumptions informed by more accurate projections. Therefore, depending on when the next stage RLDP is published, it is expected that the Council will take into consideration any updates to population and growth predications, and as such, we reserve the right to comment further on any updated figures, once made available.</p>	<p>This assessment was produced for the purpose of the Growth and Spatial Options consultation, however the Integrated Sustainability Appraisal (ISA) assesses these in more detail. Updated evidence will be considered as this emerges over the course of the RLDP process.</p>
<p>OTHER COMMENTS</p>	
<p>I write on behalf of Redrow (South Wales) Ltd to provide a response to Newport City Council’s (NCC) Growth and Spatial Options consultation in preparation of the Replacement Local Development Plan</p>	<p>Candidate Site assessments are being carried out as part of a separate process. The results of the Stage 1 assessment can</p>

<p>(RLDP) 2021-2036, in relation to land at Pentre-Poeth Road, Bassaleg, Newport (the site) as outlined on the plan below [MAP]</p>	<p>be found in the Candidate Site’s Register. Stage 2 of the assessment will be published as part of the Preferred Strategy consultation.</p>
<p>Land at Pentre-poeth, Bassaleg</p> <p>The site totals circa 25 acres and is considered to represent a logical sustainable extension to Bassaleg which could deliver circa 250 new homes. The site presently comprises former nurseries and fields. Trees, hedges, walls and fencing bound the site and the enclosures within it. The site is inward facing and slopes gently towards a stream which flows through the site. The site occupies a semi-rural setting on the outskirts of the wider built-up area of Bassaleg with good access to nearby community, education, commercial and employment centres. PROWs cross the site which can be incorporated into master planning proposals for the site.</p> <p>The site is considered to be sustainably located being situated adjacent to the National Cycle Route 4 which runs along the northern boundary of the site and this route is also designated as an Active Travel route by Newport City Council. Bus stops are located within 400m of the majority of the site. Bus routes provide services along Caerphilly Road and Forge Lane and provide services to Caerphilly, Newport, Cardiff and the Valleys. Services are frequent and cater for commuters. The site is located circa 1.5 miles from Pye Corner train station which provides hourly services to Cardiff. In terms of vehicular access, the site is accessible from the local highway via Pentre-poeth Road or Griffin Road both of which connects to A468. Junction improvements works will be required to support development, which will form part of the development proposals.</p> <p>Most existing and new employment opportunities in Newport are to the west of the city. These are within easy accessibility of the site. Many community services are easily available – Bassaleg Comprehensive, Pentre-poeth Primary School, local pubs and restaurants, shops, children’s play area, playing field, community centre, allotments, church and cemetery.</p> <p>As is evidenced by the extracts from the Adopted LDP Proposals Plan and Constraints Plan, whilst the site currently sits within a Special Landscape Area, it is located adjacent to the existing settlement boundary and the site is free from any other planning constraints and any overriding unresolvable physical constraints, including infrastructure and utilities, access, ground conditions, landscape, heritage designations, flood risk issues and pollution. Therefore, the site is considered to be deliverable early within the Replacement LDP timeframe with no significant enabling works required.</p> <p>With regards to the site falling within a Special Landscape Area, this is a local designation and should be reviewed through the LDP replacement process. Furthermore, the site benefits from a local landform with an inward facing nature meaning that any development would not be widely visible from the open countryside.</p>	<p>Candidate Site assessments are being carried out as part of a separate process. The results of the Stage 1 assessment can be found in the Candidate Site’s Register. Stage 2 of the assessment will be published as part of the Preferred Strategy consultation.</p>

A Minerals Safeguarding Area is located adjacent to the southern boundary of the site, but this is not considered to present a constraint to the development of the site. Whilst an Air Quality Management Zone is located within Bassaleg, it is considered that appropriate mitigation measures can be incorporated into any development proposals for the site.

Adopted LDP Proposals Map

[MAP]

Adopted LDP – Constraints Map

[MAP]

It should also be noted that the land was promoted in the Newport UDP and was found by the Inspector to be suitable and deliverable for housing purposes but that it was not needed due to the brownfield land supply proposed by the Council within that plan. It was also promoted through the currently adopted LDP process but due to the Council continuing with the progression of a brownfield strategy, the site was not considered for allocation. However, it is now acknowledged by the Council that due to the success of their brownfield strategy, greenfield releases will be required to support the level of growth required in Newport over the next plan period. In this regard, the site is immediately available for residential development, with the site being technically deliverable and free from legal constraints. The UDP Inspector stated that in planning terms it is a desirable site which can deliver much needed open market and affordable new homes in Newport.

Whilst the site was not submitted during the Call for Site in August 2021 but given the time lapsed, we are now in a position to make this submission and hence the submission of this representation. It is also felt that due to the unforeseen delays with the Replacement LDP process, that the Council should undertake a Second Call for Site alongside the Preferred Strategy Consultation to ensure that the Council allocate the most suitable and deliverable sites within the emerging Replacement LDP. Candidate site details can be submitted for the land should NCC wish to review them at this stage. Redrow are also willing to work with other landowners in the wider area to the comprehensive development of the area, maximising benefits for the local community. The map appended (South and West Bassaleg Land Ownership) shows the potential extent of the wider area.

Direct comments on the Growth and Spatial Options, January 2023 are set out in the attached consultation form, along with the above site information in the 'Any other comments' box. In summary, we broadly support the growth and spatial options proposed by the Council and support the need for growth in Newport to achieve the aspirations of Future Wales. We encourage the Council to adopt an approach that allocates the right sites in the right locations as advocated by PPW which can demonstrate that they are suitable, deliverable, and sustainable whilst also positively contributing towards the Council's housing delivery targets and placemaking principles.

We reserve the right to comment further at the Preferred Strategy stage specifically in relation to the site selection process although we consider the site to be sustainably located and deliverable such that the site is considered worthy of allocation in the RLDP.

GSO 063 - Alan Cunningham - 00843

Question / Response	Officer Response
<p>I am writing in support of the proposed plans to build a train station in Caerleon. As a resident of this town, I believe that a train station would bring numerous advantages to the community and improve the overall quality of life for those living and working here.</p> <p>1. Sustainable transport: A train station would provide an environmentally-friendly mode of transportation for commuters, reducing the number of cars on the road and easing traffic congestion. Currently, many commuters in Caerleon rely on cars to travel to work, leading to traffic jams and increased pollution. A station would help to reduce air pollution, which is an increasingly important issue in today's world.</p> <p>Another key advantage is access to the national cycle path. This would provide a safe and convenient way for people to cycle to and from the station, promoting active and healthy lifestyles.</p> <p>Improved transport connections: A train station would increase connectivity and accessibility for residents, enabling them to easily travel to other parts of Newport, as well as to other cities such as Cardiff and Bristol. This would help to open up new job opportunities and improve access to healthcare and education.</p> <p>Economic growth: A train station would help to boost the local economy, bringing more tourists and visitors to Caerleon. This would provide a much-needed boost to local businesses, creating new jobs and driving economic growth in the area. The station would also provide an easier and more convenient way for tourists to visit Caerleon's historic landmarks and attractions, such as the Roman amphitheatre and the National Roman Legion Museum.</p> <p>I understand that plans for the train station were taken out in 2015, and I strongly urge the council to include the building of the station in their plans. The benefits of a train station for Caerleon and the wider region are significant, and I believe that it is a valuable investment in the future of the area.</p> <p>In summary, I believe that building a train station in Caerleon would have numerous benefits for the local community, including improved transport links, reduced traffic congestion, enhanced access to job opportunities, education and healthcare, and increased economic growth. I therefore strongly support the proposed plans and urge the council to move forward with this project.</p> <p>Thank you for considering my views on this matter. I urge you to support the building of a train station in Caerleon, and I look forward to hearing about the progress of the consultation.</p>	<p>The Newport Local Development Plan currently includes policy T1, which supports all proposals for new stations, including a station at Caerleon. The role of the Local Development Plan is to facilitate new and improved stations, but it does not directly allocate these or determine the location of new stations.</p> <p>As part of this process the LDP team will continue to work with partners, including Welsh Government and Transport for Wales, during the preparation of the replacement LDP to ensure any amendments to policy T1 reflect the opportunities identified by the appropriate transport strategies and that our development strategy seeks to support the delivery of strategic and local transport improvements.</p>

Question / Response	Officer Response
Growth Options	
1. Are there any scenarios that have been discounted which should be considered further and why?	
Not that I am aware of.	Noted
2. Which of the options do you feel is the most appropriate, and why?	
Option 6 offers the most positive responses to the objectives set. The downside is less housing completions and potentially less employment opportunities.	Noted
3. Are there any other matter that should be taken account of when assessing these scenarios and identifying a Preferred Strategy?	
Following on from (2), the number of large housing developments currently paused or having futher potential needs to be taken into account. Likewise, there does not seem to be a shortage of potential employment land, based on previous and current scenarios.	Noted, the Preferred Strategy Cabinet Paper, the Preferred Strategy Consultation Paper and associated background papers provide greater detail on this.
Employment Land Options	
Recommendation One -	
4. Is the requirement appropriate for Newport?	
This would appear appropriate, based on past and current projections.	Noted
5. Should it be different and if so, why?	
No.	Noted
Recommendation Two -	
6. Should some sites be removed from the employment supply? Why?	
Possibly. It seems that some sites would lend themselves to regeneration, which would reduce the need for other sites to be developed.	Noted
7. Should alternative land uses be considered for some sites? Please provide examples of such uses and your rationale for this.	
Possibly.	Noted
Spatial Options	
8. Which of these options do you feel is the most appropriate, and why?	
I support use of previously developed land and re-purposing of redundant buildings.	Noted
9. Are there any other spatial distributions that should be considered, and if so, why?	
I strongly feel that re-use of empty/redundant buildings needs to be progressed, particularly in the city centre where there is a lot of unused space. This comment is also appropriate to the wider city built environment, for example in Pill, Caerleon and Chepstow Woods areas.	Noted
10. Are there any other matters that should be given consideration when assessing these?	
Following on from (9), this redevelopment would need appropriate public transport arrangements, to reduce the need for parking space.	The role of the Local Development Plan is to facilitate new and improved services, but it does not directly allocate these or determine the location.

	<p>As part of this process the LDP team will continue to work with partners, including Welsh Government and Transport for Wales, during the preparation of the replacement LDP to ensure policy reflect the opportunities identified by the appropriate transport strategies and that our development strategy seeks to support the delivery of strategic and local transport improvements.</p> <p>This assessment was produced for the purpose of the Growth and Spatial Options consultation, however the Integrated Sustainability Appraisal (ISA) assesses these in more detail.</p>
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Evidence Base	
11. Are there any other pieces of evidence that you believe should inform the development of the preferred growth and spatial options strategies?	
Continuing from items (9) and (10), it would seem that local area developments of building re-use needs to be more widely progressed. There are some good examples of this around and coming on Stream, the city needs a lot more of them.	Noted
12. Are there any other comments you'd like to make regarding anything within this consultation document? Do you agree with the Objectives for the RLDP? If not, how and why do you think they should be changed?	
Broadly, I agree with the general direction of the RLDP. It must by it's very nature be a compromise of many factors.	Noted

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GSO 065 - Mrs P Tyers - 00210

Question / Response	Officer Response
<p>I am sorry I could not attend the meeting on Thursday 16th February at Rhiwderin Community Centre. I believe no building plans for Bassaleg or Rhiwderin should be considered, as the traffic noise and pollution levels are very high according to Mr Steve Manning Environmental Officer. People's health is suffering. Young children are in haling the fumes from the lorries.</p> <p>Areas which should be considered are the left hand side of the A48 towards Chepstow and Coldcliffe areas. They are near the M4, thus relieving the congestion on the 'A' roads through the villages.</p> <p>Renovating empty properties and converting empty shops into flats would be cheaper than new builds. The infrastructure e.g. roads would already be there.</p>	<p>Noted, Section 5 of the G&SO indicates the spatial distribution options which are considered to be broadly realistic for the RLDP. These options have been derived through an application of national policy principles with relation to prioritising the reuse of previously developed land, as well as an early understanding of land availability and the need to support rural communities within the authority area.</p> <p>The options have been assessed at a high level in relation to their contribution to the emerging objectives of the plan, including:</p>

	<p><i>“Population and Communities - To provide high-quality homes that meet the needs of Newport, as a national growth area, and to ensure that these homes are supported by the necessary social, environmental, cultural and physical infrastructure to provide safe and healthy places for people that maintain and enhance community and settlement identities.</i></p> <p><i>Transport and Movement - Reduce the need to travel and increase the use and provision of sustainable travel options.</i></p> <p><i>Climate Change - To ensure that development and land uses in Newport are resilient to the effects of climate change, and actively tackle the causes and impacts of climate change through minimisation, adaptation and mitigation.”</i></p> <p>The issues of traffic, air quality and pollution will be considered in further detail as the plan progresses.</p>
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Question / Response	Officer Response
<p>I wish to raise my concerns that more housing development might take place in the Rogerstone area. I understand that you are looking at Newport area as a whole, but I am not familiar enough with the other areas of Newport and can only comment on the area I live in.</p> <p>Rogerstone has already seen a great deal of housing dev. in the recent years i.e. Power Station site and Alcon site where hundreds of new houses have been built, as well as a number of smaller estates around Rogerstone, these have put a strain on Public Services i.d. Doctors, Dentists, Schools, and Road Traffic, Parking in the area, etc.</p> <p>My main concern is that any more development should only be allowed on 'Brownfield sites', and to keep existing 'Greenfield sites' for the enjoyment of everybody, these places are few and we should keep them to maintain a balance of green space for wild life to flourish which enrich our lives and provide a barrier from other councils.</p>	<p>Noted, Section 5 of the G&SO indicates the spatial distribution options which are considered to be broadly realistic for the RLDP. These options have been derived through an application of national policy principles with relation to prioritising the reuse of previously developed land, as well as an early understanding of land availability and the need to support rural communities within the authority area.</p>

I understand houses need to be built but for the benefit of the people of Rogerstone, the countryside and its wildlife, please can house building be restricted to Brownfield sites.	
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GSO 067 - Bethan Bowden - 00842

Question / Response	Officer Response
<p>I have focused on the spatial options as this is more easily viewed with a public health lens. However, the options paper has already considered and reflected on the issues that I would typically address that would include:</p> <ul style="list-style-type: none"> - opportunity to utilise active transport networks and - accessibility/connectivity to public transport hubs to facilitate the modal shift away from car usage - air quality management in view of existing poor air quality in Newport - community connectedness within established communities to enhance wellbeing <p>It was great to see such consideration of these issues already within the RLDP.</p> <p>In response to the specific questions around spatial options within the consultation, I would be supportive of a hybrid approach. I appreciate the challenges of the balance of growth within this option but it could seek to maximise the factors identified above in supporting existing communities resilience and connectedness, with opportunity to develop sustainable transport and travel options.</p> <p>I am not aware of a process within the Health Board for responding to non-statutory consultations so just to clarify that I am responding on a personal level and this is not a response on behalf of the Health Board.</p>	<p>Noted. The Spatial Option taken forward is discussed in detail in the Preferred Strategy Cabinet Paper, the Preferred Strategy Consultation Paper and associated background papers.</p>

GSO 068 - Monmouthshire County Council - 00031

Question / Response	Officer Response
<p>Many thanks for consulting with Monmouthshire County Council on the Newport City Council Local Development Plan Growth and Spatial Options. We have read the relevant documents with interest and have no specific comments to make at this stage. We will be happy to continue working with you collaboratively on both regional and cross boundary issues as the RLDP progresses.</p>	<p>Noted. We look forward to working collaboratively as our respect plans progress.</p>

GSO 069 - Campaign For The Protection Of Rural Wales - 00035

Question / Response	Officer Response
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The document details the options of six different growth options and three different spatial strategies. Future Wales: National Plan 2040 Wales provides the necessary national policy framework for the document. In obtaining evidence to support the various housing and employment growth options NCC commissioned Democratic Evidence, Edge Analytics to support the options presented.

CPRW makes the following points:

1. The structure of the report could be presented in a more effective way to tease out the issues facing Newport. The various growth options have been matched against RLDP objectives. The actions required to achieve each objective are difficult and complex and include factors other than the growth of employment and housing numbers- important though these are. The plan might be better constructed by listing the minimum requirements of each objective and then listing the requirements to achieve it, including , of course, employment and housing growth.

For example, a major objective relates to climate change. The need to reduce carbon emissions by shortening commuting journeys and providing either public transport or facilitating shorter journeys by walking and cycling are issues which the plan should address at this stage and not as bolt on bits later in the planning process.

Building resilience to climate change is key and whether it is possible now to mitigate future problems and hence reduce future costs. Rising sea levels will at some stage have a significant impact on Newport. Although it maybe some time before areas of Newport are affected by sea level rise, the financial impact and the impact on the economy will be felt much sooner. A house purchased now in a potential at risk area will become an asset of diminishing value even if a flood event may not occur for 80 years the value of the house will diminish over any long period of ownership. A similar consideration will apply to commercial premises and infra-structure. These are very major problems that will have to be faced, beginning to deal with them now rather than delaying may possibly enable them to be managed. The focus should start here!

2. The source data of the report is oversimplified, more detail might bring out clearer options. Producing growth options by numbers of dwellings without estimating the mix of housing does not provide sufficient information. There are differences in terms of possible locations, costs and land take and other planning constraints between, for example, a one-bedroom flat and a four bedroom house with a garden. Perhaps these factors have been assessed and the report shows only high-level information. In which case further information on the estimated total land required for each option would have been useful to provide in order to more fully understand and comment on the impact of each option.

3. Necessary constraints to development have not been clearly set out in the document and consequently the options presented are difficult to evaluate.

Noted, the Preferred Strategy Cabinet Paper, the Preferred Strategy Consultation Paper and associated background papers provide greater detail on this.

As part of this process the LDP team will continue to work with partners, including Welsh Government and Transport for Wales, and other authorities during the preparation of the replacement LDP to ensure any amendments to policies reflect the opportunities identified by the appropriate transport strategies and that our development strategy seeks to support the delivery of strategic improvements.

a) The provision of water supplies The pressures on water consumption has been detailed under RLDP objective 'Natural Resources' for growth options 1 to 3. To have an informed view there needs to be understanding of how this problem would be alleviated and at what cost. There is an assumption that the immediate costs of housing development would be met wholly or partly by the developer. Is such funding feasible for meeting the cost of additional water supplies? If so what would be the knock-on consequences on the proportion of social housing in the developments affected (also a cost to the developer) and other costs to which the developer may be asked to contribute? If there is a need for a new reservoir at these levels of growth are these options viable? If we are going to build resilience against future climate change how would this impact?

b) Power requirements What is the impact on power requirements in the proposed plan. If there was a proposal for a large data centre or another high commercial user of electricity in Newport, what would be the affect on other potential users? Housing development elsewhere has been stalled due to the power requirements of data centres.

c) The Green belt

Future Wales includes a new greenbelt which runs from Caerphilly to Chepstow. This has been marked on the maps provided in the Growth and Spatial Options document. In the future the precise boundaries of such a designation would be included in the Strategic Development plan for the Cardiff City area which, it is envisaged, would be prepared before the local development plans. However, the first Strategic Development Plan is due to be finalised after this Newport RLDP has been completed. It is important that the boundary of the greenbelt should be decided at an early stage of the RLDP (notwithstanding the fact that the Strategic plan will not be complete). If this is not done then there is a risk that development plans will be developed first and the greenbelt boundary made to fit around these. The landscape values of the greenbelt should be established first.

d) The Gwent Levels

The Gwent Levels are an area of major significance from an historical landscape and biodiversity perspective. The Levels are a unique manmade landscape established since Roman times. They are under significant pressure from solar farm proposals and encroachment by other development. Growth options detailed that might impact adversely on the Levels might include village expansion and possibly employment land. The unique nature of the Gwent Levels and the threats it faces have been recognised by the Welsh Government. As a result, the Levels will be subject to strategic planning guidance under Future Wales Policy. This is currently in the process of being developed. Three local authorities have responsibility for the Levels including Newport and there needs to be co-ordination between each to ensure adequate protection for this important landscape.

Significant emissions are caused by traffic congestion. The decision made (correctly in our view) not to build the M4 Relief road means that there are capacity constraints on the existing motorway. It is important that the impact of any increased traffic generation is managed closely. Failure to develop local

employment, which would tend to reduce traffic, must be a constraint on the level of housing development.

4. There is no consideration of the plans of other local authority areas.

Although Welsh local authorities need to comply with Future Wales: National Plan 2040 and other planning guidance, how this is done may conflict with the implementation of the Newport RLDP. Development of greenfield sites in Monmouthshire could, for example, impact on the viability of development sites in Newport. This may especially affect the ability to develop Previously Developed Land in Newport if other more attractive (from the developer's perspective) sites were made available in Monmouthshire.

The number of new homes built in Bristol has not kept pace with its population growth- 10% between 2010 and 2020, higher than the national average- adding fuel to that city's housing crisis.³ People working in Bristol are looking to Newport to live as there are insufficient homes nearer the city. Whilst this would tend to increase the number of commercially viable development sites in Newport it would also encourage longer distance commuting and would be contrary to the environmental and wellbeing objectives set out in Future Wales. This simply adds to the proliferation of dormitory estates in Newport (and also south Monmouthshire).

5. Spatial Options- Village Focus We object to developments to village boundaries other than appropriate in-filling within the existing boundaries whether this was within the village focus spatial option or within the Hybrid spatial option.

Significant release of land for development on greenfield sites around villages are likely to compromise other planning objectives such as an increase in commuting and the higher costs of supplying necessary infrastructure from water to transport.

The extension of existing village boundaries to develop adjoining fields may cause difficulty in limiting future inappropriate expansion as there may be no clear and logical boundary for the new expansion. Inappropriate expansion of new housing adjacent to working farms can cause difficulty especially where livestock is managed close to residential areas- sheep worrying etc.

6. Conclusions

Closer attention needs to be made to environmental issues and constraints in the production of the final plan. Within environmental constraints the plan should be employment led to minimise commuting and to gain maximum benefit for local communities.

There are constraints on development for which further information should have been provided in the consultation document (e.g., water supplies) so that a more informed response could have been made. Previously Developed Land should have priority for development within Newport and there should be co-ordination with adjacent local authorities to avoid competition for development.

Question / Response	Officer Response
<p>Growth Options</p> <p>Qu.2 Option 1 is the most appropriate option. This is the only option which provides an annual build rate above that previously achieved by the current plan, if the plan is to be aspiration and meet the requirements of its allocation in the National Growth area this level of development should be the minimum proposed.</p> <p>Qu.3 The role of the strategy to meet wider policy requirements of the National Plan and PPW, most importantly Newport's position in the National Growth Area.</p>	<p>Noted. The Growth Option taken forward is discussed in detail in the Preferred Strategy Cabinet Paper, the Preferred Strategy Consultation Paper and associated Background Papers.</p>
<p>Spatial Options</p> <p>Qu. 8 The Hybrid Option is considered most suitable. As it gives the most flexibility to provide a range of sustainable growth and best mirrors the diverse nature of the LPA. It is also understood that relying solely on PDL development with the urban areas has a number of constraints including ongoing uncertainties over the revised TAN15 Flooding. Further the Urban Expansion option is currently constrained by uncertainty over the boundary of the Green Belt required by the National Plan.</p>	<p>Noted. The Spatial Option taken forward is discussed in detail in the Preferred Strategy Cabinet Paper, the Preferred Strategy Consultation Paper and associated background papers.</p>



Planning Aid **Wales**
Cymorth Cynllunio **Cymru**

Community Engagement

Newport Replacement LDP Growth and Spatial Options

Engagement Events Report

June 2023

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1.0 Context

1.1 Planning Aid Wales has been instructed by Newport City Council (NCC) to support the engagement activity for the Newport Replacement Local Development Plan (LDP) – Growth and Spatial Options Consultation.

1.2 Our instructed brief was to prepare and deliver a series of community and stakeholder engagement events between 25 January – 8 March 2023, in accordance with NCC's Delivery Agreement. The events were targeted at identified stakeholders living or operating within the Newport City Council area. A mixture of online and face to face events were carried out. The online events were carried out remotely using the Microsoft Teams platform.

1.3 To deliver the brief our work involved:

- Analysis and understanding of the Growth and Spatial Options consultation paper.
- Review of other key documents and activities including the Delivery Agreement, previous LDP engagement activities, previous barriers identified, key stakeholder contacts etc. and discussions with NCC Planning Policy Team as required.
- Selecting, defining objectives and programming methods of engagement for the events.
- Attending and leading all events as facilitators for discussions and to encourage understanding of the LDP process and the Growth and Spatial Options consultation. The broad purpose of the events was to raise awareness and encourage responses to the Growth and Spatial Options consultation which had a deadline on Wednesday 8 March 2023.

1.4 In relation to the events our role was:

- (i) To arrange suitable dates and venues, where applicable, for the events. Send invitations to interested parties to attend events.
- (ii) Introduce the purpose, aims and key stages involved in the LDP preparation process.
- (iii) Explanation of the key themes and proposals put forward in the Growth and Spatial Options consultation document.
- (iv) Facilitate a discussion to capture initial feedback on the Growth and Spatial Options consultation document.
- (v) Advise on next steps and how communities / stakeholders can input into the process.
- (vi) Prepare a report of feedback and issues raised for NCC Planning Policy Team.

1.5 As part of the process the following work was carried out by the Council:

- (i) Provision of all relevant planning documents and stakeholder list.
- (ii) Provision of details of the Growth and Spatial Options consultation document.

1.6 The role of Planning Aid Wales in drafting the issues report is to report back the issues and comments raised by attendees at each event. Therefore, the issues and comments listed within this report are solely those of the attendees who attended each event and do not represent the views of Planning Aid Wales.

2.0 About Planning Aid Wales (PAW)

- 2.1 Planning Aid Wales is a registered charity that advocates and supports community involvement in planning in Wales. Founded in 1978, we have over 40 years' experience of helping individuals and community groups to understand and engage with the planning system. Our core services include delivering planning training to a range of audiences, developing easy read planning guidance and a free planning advice helpline. We are an organisation that has been commissioned for many community engagement planning projects in Wales; we have built a significant repository of engagement methods, tools and techniques and regularly publish news on good engagement practice.
- 2.2 We recognise LDP preparation is an important avenue for securing more effective public involvement in planning; our current business plan identifies LDP review as one of the three elements in the planning process on which we focus our engagement efforts.
- 2.3 Planning Aid Wales is an advocate of meaningful community engagement in planning. Through our work, we seek to raise the knowledge and capacity of communities to engage, but not just in the activity at hand - we seek to enable people to effectively participate in planning activities on an ongoing basis.
- 2.4 As an independent third party organisation, we have found time and again that communities are willing to engage with us, even where Local Planning Authorities have encountered barriers to engagement in the past. As part of our process, we encourage active collaboration between Local Planning Authority (LPA) staff and community groups, thereby building better relationships for future engagement. We take no view on any local policy or specific development; we only support individuals and communities to express their own views effectively.
- 2.5 We recognise that the planning system can be complex and the needs / wants of communities do not always align with other interests. We manage expectations by helping our beneficiaries understand that planning is a holistic system that seeks to address a wide variety of priorities, and clearly explain the scope and limitations of what the planning system (or particular activity) can achieve.

3.0 Stakeholder Growth and Spatial Options Engagement Events

3.1 Given the number of individuals and organisations listed on the Council's Stakeholder list, at the time of the current engagement work, and the additional organisations identified, it was decided to invite all to attend any of the advertised events. It was considered that this would provide a cross section of views and discussion. The following is a broad list of the groups that make up the stakeholders:

- Community Councils
- Gypsy and Traveller Organisations
- Heritage and Cultural Organisations
- Transport and Utilities
- Environment and Rural Organisations
- Developers and Development Consultants
- Community Groups and Organisations
- Individuals/ Residents

3.2 The events were advertised using an online booking system. In addition, the engagement activities were advertised on the Council's website, social media posts, newsletters and also promoted by other organisations.

3.3 Ten events were held, and the groups invited to eight of these events, two events were arranged by a specific group, NCC Community Councils Group and Newport Youth Council. A mixture of online and face to face events were held, four events being online and six face to face events. The timing of the events was varied to allow for wide participation i.e. morning, afternoon and evening sessions. The date and format of the events is listed below:

- | | | | |
|-----|-----------------------------|-----------|------------------|
| 1. | Online | Morning | 14 February 2023 |
| 2. | Rhiwderin Community Centre | Evening | 16 February 2023 |
| 3. | Caerleon Town Hall | Afternoon | 21 February 2023 |
| 4. | Newport Centre | Evening | 21 February 2023 |
| 5. | Ringland Community Centre | Afternoon | 22 February 2023 |
| 6. | Pill Millennium Centre | Evening | 22 February 2023 |
| 7. | Online | Afternoon | 23 February 2023 |
| 8. | Newport Youth Council | Evening | 24 February 2023 |
| 9. | Online | Evening | 28 February 2023 |
| 10. | NCC Community Council Group | Evening | 7 March 2023 |

3.4 It was agreed with NCC at the outset of the project that the Planning Policy Team would not attend the events to allow for an independent discussion of issues.

Format of events

3.5 All events followed a similar format. Mark Jones, Planning Engagement Officer, Planning Aid Wales, introduced the event and provided an explanation of Planning Aid Wales and their role as independent facilitators for the event. The main presentation covered:

- Current position of Replacement LDP in Newport
- Introduction to the Growth and Spatial Options consultation document
- Growth Options
- Employment Land Options
- Spatial Options
- How to respond and next stages
- Conclusion

3.6 At the end of the initial part, a brief question and answer session took place to address any issues on the process. Mark Jones then delivered a more detailed presentation on the content of Newport Growth and Spatial Options consultation document. In addition, there was also a discussion on wider issues raised by the attendees. Questions were invited and where possible responded to, the issues raised were also noted for inclusion within this report. Planning Aid Wales participated in all the discussions to listen to the issues raised and also to pose queries to facilitate discussion.

3.7 The event concluded with Planning Aid Wales repeating the deadline for comments on the Growth and Spatial Options consultation of 8th March 2023. It was emphasised that this was an appropriate time to make meaningful comments to influence the LDP as once the document moves forward the opportunity to influence the plan will become less. Attendees were also advised that an independent inspector would examine the plan on behalf of the Welsh Government and prepare a report on the soundness of the plan.

Event attendance

3.8 All stakeholders and residents listed on the Council's Stakeholder list, at the time of the Growth and Spatial Options consultation engagement work, and any additional organisations identified, were invited to attend at least one event, invitations were sent by email and letter. A copy of the invite is included in Appendix 2. A total of 1300 invites were initially sent; further invites were sent to stakeholders who registered their interest on the Council's database before the conclusion of the events. In addition, the advertisements of the engagement work on other sources also attracted interest and attendance. Follow up contact was also made with stakeholders to highlight the events. The table below summarises the bookings and attendance at each event:

Event	No. Bookings	No. Attending
--------------	---------------------	----------------------

14 February 2023	13	13
16 February 2023	23	35
21 February 2023 (afternoon)	30	23
21 February 2023 (evening)	14	5
22 February 2023 (afternoon)	8	8
22 February 2023 (evening)	4	2
23 February 2023	18	21
24 February 2023	N/A	8
28 February 2023	21	13
7 March 2023	N/A	7

4.0 Summary of Issues Raised

4.1 The events generated a number of views and identified a number of issues from all participants and these are listed in Appendix 1 of this report. In summary, there were a number of common issues which are summarised below under the following broad headings of the Growth and Spatial Options consultation:

- Growth Scenarios.
- Employment Land.
- Spatial Options.

4.2 It is noted that a number of respondents made similar comments to those that were raised at the Vision, Issues and Objectives consultation. Furthermore, it was apparent that a significant number of attendees had not read the consultation paper before attending the event. In addition, there were a number of comments made at various events in relation to the following matters:

- Knowledge and understanding – a number of respondents felt that on issues such as growth scenarios and employment land issues, that they did not have enough experience or understanding to comment fully on the scenarios put forward by Edge Analytics. This was also a caveat to the comments that were made by respondents. Therefore, a number of comments made relate more to their opinion on the concerns and issues facing Newport and how this would relate to any future growth.
- The demographic date used - It was suggested that the demographic data used in the assessment appear was based on 2020 ONS data, the Welsh Government have issued updates since this report. Therefore, it was felt that some of the information in the growth scenarios is out of date. Across Wales population growth predicted in previous LDPs in Wales have not come to pass and most LPAs have had to scale down their LDPs in light of the Welsh Government data from 2020.
- Consultation Approach – It was argued that the approach to discard some of the initial growth scenarios is not appropriate. If this is an options based approach to consider the growth scenario, it is not considered to be growth options consultation if some options already discarded. It was accepted that Policy 33 of Future Wales promotes sustainable long term growth but Policy 9 of Future Wales recognises the importance of national natural resource management areas and the sustainable management of such areas. The Gwent Levels is specifically mentioned as a key strategic resource and is one of only 6 national areas. Therefore, there is a caveat against the underpinning that the current document provides long term growth is in conformity with Future Wales 2040.
- Candidate Sites – a number of respondents commented on the lack of information on candidate sites and why this information is not released now. Comparisons were made to a neighbouring authority. There was a feeling that attendees could not comment on growth unless they knew the sites that were going to be proposed, there was also a feeling that the development sites were already known by the Council. *(PAW responded by advising this was not the case and again explained the process of the LDP and also the process involved in assessing candidate sites. A*

particular point clarified was that candidate sites were those put forward by anyone and are not sites put forward by the Council. Finally, it was also explained that the approach adopted by NCC was not uncommon in our experience of engagement on other LDPs).

Growth Scenarios

- 4.3 There was a general acceptance that there was a need for growth in the Newport City Council area. The role of Newport in relation to Welsh Government policy in Future Wales 2040 was also acknowledged. Although it was also noted that some attendees suggested that Future Wales policy in relation to growth should not be read in isolation and consideration was required for Welsh Government policy statements such as in relation to environmental protection e.g. The Gwent Levels.
- 4.4 Following, the above policy point, generally, it was considered that there was a need for housing and employment land, however, at the same time any growth strategy must recognise other constraints such as environmental designations and climate change.
- 4.5 The level of growth and which was the best growth scenario was considered to be difficult to identify, as many attendees did not feel they had sufficient information or a full understanding of how such scenarios are calculated.
- However, when considering any growth scenario it was considered important to have regard to existing issues such as traffic congestion, public transport availability and hubs and other infrastructure issues such as school capacity and medical facilities.
- 4.6 Generally there was no objection to reduction in growth scenarios for more detailed testing, as suggested by the Council, although there were some views that this was being done too early and all scenarios should be tested.
- 4.7 It was considered that the objectives to test the growth scenario were reasonable, many were cross cutting across the issues of concern such as infrastructure and no additional objectives were identified. It was also suggested that the growth scenarios needed more detailed evaluation and the current high level assessment using the traffic light system would change.

Employment Land

- 4.8 There was a general feeling that stakeholders could not comment in detail on the employment land provision both in relation to historic and future allocations and requirements.
- 4.9 On the whole there was no disagreement with the Council suggestion to take forward 77ha of employment land in the replacement LDP. In relation to the surplus from the previous plan there was no definitive view

on whether previously allocated sites should be retained. It was felt that alternative uses could be considered if there was no employment need. A number of attendees felt consideration should be given to potential future loss of employment sites and industries, e.g. current and ongoing issues in relation to the steel industry.

- 4.10 The issue of the regeneration of Newport City Centre was raised and whether employment needs could be met with a regeneration of the city centre. This would include a new vision for the City Centre and the provision of alternative employment uses away from traditional industries. This could reflect changes in working patterns post COVID, with more home working and flexible work arrangements. It was noted by some that attempts to rejuvenate the city centre and had not succeeded previously. There was also an opinion that Newport's historical assets could be a catalyst to employment creation and regeneration of the city centre.

Spatial Options

- 4.11 There were concerns with regard to the village approach and whether this option would be sustainable e.g. create more traffic and whether villages had enough services. There was a view that villages may be able to accommodate some smaller scale development and also consideration given to reviewing the current settlement boundaries.
- 4.12 There was no opposition to the other options. The hybrid approach was generally considered the most appropriate by the majority although a PDL option also had significant support. There was discussion at all events in relation to greenfield and brownfield sites. It was noted that the Council had historically been successful in promoting development in brownfield sites, although it would be difficult to achieve this in the new plan period. Overall many considered that brownfield sites should still be the focus, including using vacant buildings in town centres. Alternative views also pointed out that the cost of developing brownfield sites is greater, e.g. land remediation etc, and as such can have a knock on effect on the provision of affordable housing due to scheme viability. In addition, it was emphasised that brownfield sites can provide important biodiversity habitats and appropriate greenfield development may be a better option in some cases.
- 4.13 As with the growth scenarios it was considered the testing would need to be more detailed as compared to the current traffic light conclusion. In particular with regard to environmental and climate change issues.
- 4.14 No alternative options were put forward, although one or two people asked whether a no growth option had been considered, and there was also a suggestion of a possible new settlement to meet all the growth needs.

Other comments

- 4.15 In relation to all the above matters attendees made the following general comments which they considered relevant to the consideration of each matter. It was felt that the area had a low skilled economy and there was a need to upskill workers and enhance opportunities. A range of industries were needed for a range of people with different skills.
- 4.16 It was pointed out that 70% of the Council area was rural. Agricultural policy is changing for example with matters such as, rewilding, food security, etc. It was also suggested that there was scope for small scale employment uses within these areas and also linked development opportunities in the rural communities as contributing to making such communities more sustainable.
- 4.17 Queries were raised in relation to the housing need. Another common comment related to the potential for towns and villages within the Council area to become dormitory settlements, i.e. settlements where there are little or no services, commercial or employment opportunities and where people would then travel elsewhere to meet these needs, in particular Cardiff and Bristol. The suggestion being that the housing requirement in Newport is being driven by the needs of other areas. Where new housing led to more commuting this would also have a knock on effect on traffic issues and congestion.
- 4.18 One issue that was raised consistently at all events was with regard to infrastructure. There was a feeling that new development was coming forward without the necessary infrastructure to support it. In particular concerns were raised regarding road and transport infrastructure. A number of attendees felt the road system and capacity across the Council area was not sufficient to accommodate new developments. A common view was that development was coming forward which increased congestion and highway issues and these matters were not being adequately addressed through the planning process.
- 4.19 At the same time, it was acknowledged by some attendees that planning policy did look to reduce the use of cars in new development, however, at the same time concerns were raised that public transport was insufficient to replace the use of cars. Therefore, new development would always generate car movements. Respondents' comments suggested that the availability and accessibility of public transport did vary across the area and between towns and smaller communities. One issue that was highlighted by many was the locational relationship between the railway station and the bus station and that there was no public transport interchange between the two. There was a view that there needs to be a better link between the two so you can arrive from a train and catch a bus without the need to walk somewhere else.
- 4.20 A particular issue that was raised in relation to transport was the M4 motorway which a number of respondents said often suffered from serious congestion, including tailbacks along the slip road and back

onto the side roads leading into Newport. Any new development which would lead to use of this junction would worsen the situation.

As part of each event discussions took place at regular points and attendees were asked to identify and list issues which they felt currently existed and could be addressed within the Replacement LDP. A list of the issues raised by the attendees are detailed below, under the heading of each event.

14 February 2023 Online

Growth scenarios

- The strategy appears to focus on the constraints relating to house completion rates and population prediction. It is considered that there are other constraints that need to be considered such as environmental constraints. There are a lot more constraints that need to be considered in relation to the strategy than just housing and population.
- Easier to build houses than create jobs. Houses for Bristol to encourage commuting. Protection of the Gwent Levels / constraints on the Plan. These constraints don't seem to be considered.
- Other constraints: transport is a particular problem. Problems on the M4 – this will get worse depending on where people work i.e. living in Newport and working in Bristol. Current housing figures would mean the local traffic and infrastructure issue would not cope.
- There needs to be focus or thinking on the availability and suitability of public transport e.g. new railway stations, some in the pipeline but no commitment as yet, or a railway station in Caerleon would serve a large population.
- At 3pm every day there is congestion on the M4 between Magor and Brynglas. Traffic then runs onto the surrounding roads. Any big development should be addressed in the east before the west as the reverse would cause more traffic issues. Lack of relief road contributes to this.
- Newport is at sea level and there are issues of flooding. Drainage, including sewerage is an issue.
- Llanvaches sewers at capacity since 1985 and subject to routine storm water flooding. Also, in the planned overflow of Wentwood reservoir. A48 and St Brides have major flooding constraints. Infrastructure is required before more building.
- Understand a lot of development may be coming towards Langstone.
- In relation to the Amazon building near Llanwern jobs are coming and will grow. Newport Town Centre has digressed as others have grown. An outlet village near Llanwern could create more jobs. Not all about housing need to bring people to Newport many will bypass Newport and go to Cardiff or Swansea. Need a development like Cribbs Causeway in Newport. It can be quicker to get there as it would form east to west Newport.
- No shortage of jobs it's the jobs that are available. Need to upskill the whole area in relation to skills, opportunities and training. This would be a priority over number of jobs need better skilled better paid.

- If land is earmarked for jobs growth it will only be needed when major start-ups arrive. Very unlikely given 6000 jobs in LG dissolved over time.
- No basis for employment land expansion and must be sited where it would not complicate the infrastructure issues.
- Tourism needs to be improved and jobs are underdeveloped around Newport. New museum may bring some employment and increase attraction to come to Newport.
- Also, the medieval ship and roman remains at Caerleon, these are unique resources. Development of tourism links into other issues such as transport.
- There are long term issues which need longer term plans and education. The vulnerability to flooding lot of land not high above sea level, these could be subject to sea invasion, large areas of Newport at risk. This should be tackled before the catastrophe happens. There needs to be a 50 year horizon to identify the risks and what is needed. We seem to be starting at the wrong end of the telescope.
- Sustainability of outlet villages, development should need to reduce commuting and not encourage.
- Rather than meet housing needs for people working in Bristol rather encourage this employment opportunities to come to Newport.
- Newport is the Gateway to Wales but the M4 is an issue Newport is an ideal location to travel elsewhere such as Midlands, SW, London South Wales. The road and traffic needs to be sorted out.
- Newport is a good place to live but needs jobs, needs homes and needs tourism. Road system needs to improve this.
- Climate Change is a priority and should be top of the list.

Employment Land

- B uses should be high value and not warehouses as these are sparing on employment.
- Employment land need for power supply, how much power will be needed, need for renewable energy sources.
- Role for solar panels big development near Bishton wetland. They need to be south facing and away from people.
- Solar panels depend on scale Bishton site may be an issue.
- New housebuilding standards are needed including better retrofit.
- Solar panels on roofs of larger building such as warehouses.
- Mini Hydro schemes we have a mega water flow down to the sea.

Spatial Options

- The issues are more complex than initially appears e.g. villages expensive due to infrastructure needs. Urban expansion has less of a cost.

- Expand the bigger villages though recognise constraints e.g. Langstone has quadrupled due to hotels in locality, but it lacks a school of any size. If Langstone grows it needs the infrastructure first and community facilities.
- Good idea to expand villages and put in the infrastructure rather than create new villages. Need more of an organic growth, villages have expanded over time.
- If development pushed out to the edges of Newport the more acute problems become and has greater and adverse impact on the environment. Depends which way we come at it. Problems are becoming so acute such as transport, air quality etc these need to play a part in deciding what is needed.
- Decline of the city centre – there is potential in the city centre but the impact of development in the outskirts of the city makes the city centre problems worse.
- A vital part of the plan should be what is going to happen to the city centre. There is a lot of interest but it is lacking direction. The Plan should identify how do you revitalise the city centre, many attempts have failed. We may be concentrating on the wrong things.
- Impacts of any expansions of development in Monmouthshire and how this may impact Newport.
- Hybrid solution may be best.
- Villages equals commuting.
- Every Village has major infrastructure issues. Sewers, lane maintenance, flooding access.
- Climate change should be a leading criterion and for most of Newport it should be red..red..red.
- Village focus should be red and therefore hybrid would not work.
- Must develop better cycle paths throughout Newport.
- Meet housing requirement adjacent to urban areas.
- The Spatial Options choice depends on what strategy we are trying to resolve what are the underlying issues that arise out of each option.
- Newport has tried to redevelop and there has been no success. People go to retail parks at Spyty Road and Maesglas. Towns grow outwards. Spending on the centre will not necessarily work, out of town development offers free parking making it easier. Not convinced putting more money into city centre would be a good idea.
- Role of tourism to spatial options and the need to redevelop the town centre. Use tourism as a catalyst. Tourism can be a major attraction e.g. St Fagans but this can have major transport implications.
- Need to protect good agricultural land although poor quality agricultural land can be good for biodiversity.

Other Comments

- Will there be a response/ document produced to show how any comments raised in the consultation have been considered and taken forward or not.
- Candidate sites other LAs dealt with it differently. Failure to identify candidate sites detracts from the openness of the process.

- Is the detail available to show where the proposed development areas are?
- Communication of candidate sites... why not now. Llanvaches at capacity on sewers eleven new houses built. We were not able to mobilise opinion and Welsh Water did not object. A lot of people are very suspicious that the details of the candidate sites have not been released. Consulting is in the dark until candidate sites are communicated.

16 February 2023 Rhiwderin Community Hall

Growth Scenarios

- Before considering a scenario to provide more houses there are currently houses that are empty. These should be factored into any housing need and ways found to bring these empty properties into use.
- There is a need provide and improve the infrastructure before providing more land for employment and jobs.
- The provision of extra jobs and extra houses.
- Where are Newport CC with regard to provision of windfall sites to provide additional housing.
- There is a need for additional facilities e.g. health centres.
- There is already a strain on transport infrastructure e.g. Brynglas and congestion.
- There is a need to assess existing infrastructure and facilities before more development is proposed. There are problems now e.g. school numbers.
- There are existing school issues and these have a knock on effect to cause traffic issues – gridlock.
- Future growth needs to involve joined up think of all issues and constraints.
- There should no new LDP until all other issues are resolved.
- Development on neighbouring authorities has an impact on Newport area are these being taken into consideration.
- Is the statistical data used for the growth scenarios sufficiently robust to make any judgements on growth scenarios.
- Flooding is an issue in Rhiwderin including surface water, previous approved developments have been an issue in this regard, would new development make this worse.
- When considering housing growth there is a need to consider house sales in the area.
- No land, no housing, no Growth.
- In relation to an analysis of the objectives against each potential growth scenario transport should be red

Employment Land

- Previously employment land has been lost to housing development.
- Infrastructure is an issue on any land coming forward for development.
- In relation to additional employment land there is currently sufficient empty industrial estates,

- Brownfield development leads to a loss of employment land.
- Town extension into Docks area would allow for new infrastructure. A strategic urban extension into the Docks area.
- There is a need to consider any impact upon the green belt.
- Flood defence is an important consideration in relation to any new development.
- There have been implications from the bypass for Rhiwderin.

Spatial Options

- Pollution issues need to be considered including air quality. This is currently an issue and should not be made worse.
- Mixed views on spatial options some think PDL, some support for village option.
- PDL development loses jobs.
- Newport Centre could be a possible focus for development but this has been tried before and has not worked.
- Loss of the Royal Gwent Hospital has been an issue and should be considered in relation to new development.
- Is a new settlement a possible idea? similar to in England. This would allow all new development and infrastructure to be planned and provided.

21 February 2023 Caerleon Town Hall

Growth Scenarios

- Review of settlement boundaries needed particularly where a settlement can meet relevant tests of providing services, etc.
- Reopening railway and Caerleon Station would be a positive issue.
- There is a major impact on Newport due to the draw of Bristol, people in east Newport are living and working elsewhere.
- What has the current growth strategy achieved in relation to local economy, facilities, environment and infrastructure. AMR has not addressed this point.
- There is social segregation of rich and poor areas. There are now more deprived areas than before.
- Could we have done better with current growth?
- If you are going to grow, you should not take away vital services.
- The migration of communities leads to everyone go back and fro.
- Existing infrastructure needs assessment. When considering new development there is a need to understand schools are at capacity, GP practices are full etc.

- Air quality is currently an issue, one way system contributes to this, there is congestion in Caerleon and as a result Caerleon is polluted.
- No issues with growth scenarios are they really any different?
- Loss of bridge tolls has meant M4 traffic and associated problems is getting worse.
- Need to consider Caerleon as a unique location due to the Roman remains.
- The type of housing needs to be considered there is a clear shortage of affordable housing, the growth strategy needs to consider this issue.
- There is a need for the new LDP to provide balanced communities.
- Lorry traffic is an issue.
- The provision of adequate infrastructure is integral to any new development.
- If there is no plan growth will just happen, what we require is appropriate growth.
- Green belt does not appear to be considered in the current consultation.
- The plan needs to accommodate the implications of pollution and associated legislation.

Employment Land

- There is no shortage of employment land.
- Loss of employment land may be considered for other uses such as housing.
- There will be pressure on the remaining employment sites for future jobs use too.
- There needs to be an emphasis to attract investment for housing and employment together.
- Technology security of new development areas is a consideration e.g. no fly zone.

Spatial Options

- Previously NCC focussed growth on PDL, are we now running out of this type of land?
- Newport has been good at developing large brownfield sites due to the decline of the steel and aluminium industries. Best use has been made of such sites. Reclamation of such sites has been good.
- There is still plenty of brownfield sites in the Council area that could be used.
- Hi tech industries do not require large sites.
- Employment sites and housing sites can mix satisfactorily therefore reducing travel issues.
- Making best use of land could be a positive or a negative for the green belt.,
- There is a concern about the implications of a village development strategy in relation to impacts on wider area and sustainability.
- The footprint of the city centre is too large.
- Some development within villages is important to sustain and enhance communities and sustainability of such settlements.
- A new settlement would have wider negative impacts.

- Other areas such as Torfaen provide a commercial centre, new employment should consider the need for research and development.
- Majority of meeting supported PDL approach with hybrid option being the next appropriate. No support for Village or urban extension strategy.

Other Issues

- Candidate sites should be released before consideration of growth strategy.
- Why has this not been done, other authorities have released their candidate sites earlier.
- Implications of potential freeports.

Tuesday 21 February Newport Centre

Growth Scenarios

- The population is increasing therefore there is a need for more houses.
- What about the relationship to other strategies such as tourism e.g. NCC events, there is a need for things to do and Newport Heritage needs development so people will come. Planning can contribute to a change of image.
- There is a need for more employment and industry.
- City centre needs regeneration, out of town developments has caused issues.
- There is a lot of housing, but employment provision is not so good.
- The dwelling led approach will exacerbate the current problems.
- There is a need for a balance between housing and employment land.
- City centre economy needs to be boosted there are too many empty properties.
- What is meant by climate change?
- There is a conflict between all the objectives and these require a deeper thought.
- Educational resource should be included as a RLDP objective.

Employment Land

- There is a shortage of employment land, one business was looking for 4000sqft. Don't lose employment land provision.
- There is a need to redefine the town centre e.g. as an entertainment centre. Also to make better and more use of the heritage sites. This can be an economic catalyst for growth. There needs to be a new magnet to the town centre.
- There is a need for light industrial uses/ cottage industries and these should be encouraged in the LDP.
- In relation to housing in town centre better use should be made of living above shops.

- Re employment what will happen in 15 years, the steelworks could go anytime. What will be the impact of the loss of the steelworks?
- Agriculture is important. Keep agricultural land in agriculture, no loss of land. Encourage the use of agriculture as an employment resource. Land has been taken off for wetlands, however, SSSI should stay SSSI.

Spatial Options

- PDL is the better option, although a hybrid option is also a reasonable approach.
- Village development can be more difficult. More access for use of car are smaller villages sustainable,
- Infrastructure in villages is not good, making development difficult, including the absence of sewers and mains drainage.
- No need for a new town/settlement there is a town already here!
- The river area is an improvement and example of what the city can achieve going forward.
- The rail station in Newport is a problem. it is difficult to get there.
- Overall the feeling was the most appropriate options was PDL or hybrid strategy.

Other Issues

- There is a need to encourage people to use public transport, make it available, welcoming, regular and cost effective.
- Infrastructure issues. Roads are a big issue including surrounding roads and M5/M4 interchange. However, routes into Newport not too bad and it is close to other cities, gateway to Cardiff. The development of the Metro will be a positive. There is a need to promote active travel options. Finally, the 50mph is not effective.

22 February 2023 Ringland Centre

Growth Scenario

- Newport is the Gateway to South Wales.
- Cheaper housing stock is being taken up by commuters to Bristol.
- Interpretation e.g. Penhow is impacted by developments in Monmouthshire, is it part of Newport?
- Plan can be too city focussed.
- Need liaison with neighbouring authorities in relation to development and planning.
- Are the council assuming Llanwern will go, if so, there needs to be a contingency plan.
- Penhow does have some small sites around the village, but there is a plenty of brownfield land in Newport.
- Infrastructure is an issue the road system is not fit for purpose e.g. A48 and M4. Infrastructure has to be reviewed before development.
- Public transport including rail links to road system is not good.

- Building on farmland is a concern, this land is needed for agriculture.
- Objectives for testing the growth scenarios should include Welsh Language and education.

Employment Land

- Until infrastructure is sorted it is not considered that firms will want to come to Newport.
- Provision of land does not automatically equal number of jobs, a large land take may only employ a couple of people and vice versa, depending on the business.
- There needs to be a variety of businesses catered for with a variety of job opportunities. Historically the steelworks attracted specific trades but there needs to be greater variety going forward.

Spatial Options

- Newport City Centre needs change to encourage more use. No need for any further out of town developments. Friars walk provides niche shops but is not considered to have been successful.
- Penhow has no services to support development. No transport links, schools and would lead to unsustainable development. It is wishful thinking to develop such areas to make them sustainable.
- Villages should accommodate for people who move but want to move back to their original community.
- The docks are at capacity – urban expansion is it viable?
- PDL cannot be the only answer, Llanwern is the only one going forward.
- Villages have brownfield land but there is no settlement boundary to allow development at present. This needs to be reviewed and settlement boundaries reinstated. A few houses here and there would be acceptable but not disproportionate housing estates. Village infrastructure is directing these developments.
- Air quality is an issue which should be considered when looking at where to develop.

22 February 2023 Pill Millennium Centre

Growth Scenario

- Infrastructure issues, roads, schools, hospitals, and commuters. Bristol provides demand for housing.
- How much influence will the Future Generations Commission have on the plan?
- There is a need to discourage the car but there needs to be an alternative mode of transport.
- Development will be to the east of Newport.
- Housing development will happen anyway.
- City centre needs regeneration at the moment there is no reason to go there.
- Loss of Admiral had a big impact on jobs. Also loss of Llanwern and The Passport Office. There is a need to attract ore employment to Newport.
- Objectives of growth are cross cutting where does provision of public space fit into this.

Employment Land

- Re employment there is a need for large buildings somewhere
- Why would you reallocate employment land if there is a need.

Spatial Options

- Villages can take development this should be sufficient to support facilities. They are not no go areas.
- Hybrid is a good way forward. Need a balanced approach.
- Do not expand into gaps as there is still a need for green spaces.
- Future policies important in relation to such issues as space standards and the health impact of housing

23 February 2023 **Online**

Growth Scenario

- Spatial development of the options rather than the particular growth options. Key issues as a transport operator are where housing is and can it connect to transport services.
- Growth Scenarios broadly cover the realistic options.
- NRW more input at preferred strategy. Offsetting the effects of growth on environment. Few of the growth scenarios favour natural environment and biodiversity and conservation.
- How will any of the growth scenarios translate into the provision of affordable housing, with the broadest sense of affordable housing – probably need 25/30% housing provision being affordable. There is a dash to smaller properties and therefore implications on density.
- Torfaen is looking at a higher growth scenario, Newport is recognised as growth area in Future Wales. Need to see growth form current allocations to what can be accommodated.
- How much will the LDP take account of neighbouring LPAs plans given the need for regional growth. how do these affect Newport CC growth strategy. There will be regional growth.
- Infrastructure and roads are an issue including serving and delivering employment land. Roads review will have an impact on such matters.
- Overall no strong feeling on scenarios.
- GWR interest will be greater once plan progresses and sites come forward. Key issues will be movement of people to and from sites. In relation to reopening stations generally GWR would support. Encourage a modal shift.

Employment Land

- Servicing and delivery of employment land M4 decision and roads review, who will build these sites and how will they be delivered. Getting service sites together is an issue.
- Transport and movement a better expression than infrastructure on this matter. High footfall sites should be located where train providers can serve them easily without massive financial input. Therefore, need to be attractive to users in relation to transport and in past some sites may not have achieved this.
- GWR interest will be greater once plan progresses and sites come forward. Key issues will be movement of people to and from sites. In relation to reopening stations generally GWR supported the principle elsewhere in UK. Encourage a modal shift.
- In relation to employment site particularly power supply is an important consideration, role of renewable energy and electric vehicles. Needs to be liaison with the likes of national grid so any sites can be delivered and meet climate change objectives.

Spatial Options

- The hybrid approach would be most appropriate e.g. Urban extension and urban development and villages. One scenario on its own would bring too much pressure on just one settlement.
- Villages could take some share of the development needs. Must be considered on a settlement to settlement basis looking at all considerations, some could take more than others. Each location should be looked at to see if it passes relevant tests but not isolated locations.
- Take account of the new railway station in Cardiff could bring options e.g. Marshfield could be a suitable location for development.
- Consider 15 minute communities having regard to the comment above on villages. From an affordable housing point needs to be serviced well and not isolated.
- PDL is best option to minimise the loss of greenfield land, not just putting development in the areas there is knock on services e.g. groundworks such as sewers.
- Protection of the Severn Estuary to south issues such as emissions will have a knock on effect. These impacts must be minimised. (NRW).
- PDL is the main option but there will need to be a release of some greenfield sites.
- Brownfield sites the big issue is viability such as contamination and remediation issues, particularly for housing. Most of the easier sites have been developed leaving the more difficult ones to address. Qualitative discussion but will have implications on sites coming forward.
- Consideration of the Placemaking Charter which sets a new way of looking at things.
- GWR view development around sites that can be served by public transport, this is another option. Sites that are brownfield can be difficult to serve effectively.
- Urban expansion may not generate sufficient demand for public transport and therefore people default to other methods of transport.
- Deliverability will be an important issue on any of the spatial options.

- Brownfield sites can have biodiversity, but need to look at broader picture, likely to relate to particular sites.
- Is there sufficient PDL available can the supply meet the growth demand? Particularly with issues such as flooding and public transport/active travel.
- Villages may be able to bring any forward sites but deliverability and viability could be an issue in order to provide adequate services and infrastructure.
- Villages can provide some sites to make them sustainable, scale will be the key issue. However, major consideration will be drainage.
- Objectives an important part will be deliverability, not an objective run through the process.
- Placemaking is more intrinsic to the plan as a whole and not just an objective in its own right.

Other issues

- Role of community led housing as part of the affordable housing contribution.
- Lack of communication between Councils in relation to Cardiff Parkway station and its implications.
- Need joint working with partners e.g. National Grid where they have plans and not make decisions in isolation.
- The other Burns Report stations, within the LDP area, are important considerations in the preparation of the LDP. GWR happy to discuss in detail with LDP team.

24 February 2023 Newport Youth Council

- PDL should be looked at first, Newport industrial heritage means there should be a lot of such land.
- Need better quality developments.
- A new use and vision for the city centre. There is the skate park but there needs to be more things to do. In the city centre.
- There is a need for more houses, in particular social housing.
- Consideration to a 15 minute city.
- Poverty in Newport is a major issue.
- Design is important more green buildings and carbon zero.
- Growth is needed in Newport and more jobs are needed.
- It is desirable to provide a city where people want to stay.
- Need for planning to provide a prosperous and sustainable city and county where “I want to live in the future”. At the moment young people just want to move away when they can.

28 February 2023 Online

Growth Scenario

- The demographics used in the assessment appear to be based on 2020 ONS data Welsh Government have issued updates since this report. Therefore, it is felt that some of the information in the growth scenarios is out of date. Across Wales population growth predicted in previous LDPS in Wales not come to pass and most LPAS have had to scale down their LDPs in light of the new Welsh Government data since 2020. These updated figures should be factored into consideration before a decision is made.
- The approach to discard some of the initial growth scenarios is not appropriate which is a claim based on Policy 33 Future Wales 2040. If this is an options based approach to consider the growth scenario, it is not considered to be growth options consultation if some options already discarded.
- Accept Policy 33 of Future Wales promotes sustainable long term growth but Policy 9 of Future Wales recognises the importance of national natural resource management areas and the sustainable management of such areas. The Gwent Levels is specifically mentioned as a key strategic resource and is one of only 6 national areas. Therefore, there is a caveat against the underpinning that the current document provides long term growth is in conformity with Future Wales 2040.
- One other option that does not find favour is a continuation of the current LDP growth strategy. This was an aggressive growth scenario itself and the current potential growth suggested will be higher than this.
- NCC have followed prescribed scenarios from WG and some are not feasible and hence discarded. Newport is a sustainable location, while development in the whole county outside the city in the countryside/villages is not sustainable.
- The level of the Welsh Government growth needs, as an identified growth area needs to be on the higher scale, if NCC go lower there will be a potential issue. Therefore, need to look at one of the higher scenarios.
- Favourite is option 2 with the wider economic benefits and reduce out commuting. Difficult to make a decision as there is a limited amount of information/ context to do so.
- Newport should not discard options before an option stage. The latest estimates were out in chat.
- Table 3 is too high a level of assessment, there is no value in it, what is this assessment indicative of, need a more in depth way of looking at this matter. Does not assist in supporting a scenario. Would rather wait for when there is a more detailed integrated sustainability strategy to assess. Therefore, difficult to visualise the development related to the growth scenarios.
- No references to average dwelling per hectare, nothing there to show housing land requirements. Have this figure for employment but not housing.
- Support NCC in relation to description of the Gwent Levels as a significant constraint. Newport has a strange spatial pattern with a hugely important site to south and south west of the city and then Wales's largest brownfield site to the east. It is therefore hard to see where growth could be located at its most sustainable location. Also support reference to Green Belt significance. Given the significant constraints it is hard to see where the growth could go.
- No mention of renewable energy generation in the document. This is major land use and employment type and is becoming more and more important. Would ask that this should be looked at on the options.

- There is more up to date ONS census data available than in the current consultation.
- Other factors that have impacted Newport include the removal of tolls on the bridge and thereby increasing house prices. There are a number of external factors and therefore the parameters on the figures need to be expanded.
- Don't understand how the traffic light system assists. Climate change how would this be affected by development or how this issue affects the development.
- The current information is too broad brush it forces people down the road of what is most important. There is a need for more detail and there needs to be a balance and comparison of these matters.
- See as a simple visual aid not a detailed assessment.
- Whilst the above point is accepted it tends to force you along the road of what is most important to me and in reality, it needs to be more complicated.

Employment

- Two sites to be retained in option 2 are in or on edge of the Gwent Levels there would be possible objections to these if they affect the SSSI.
- Not possible to roll sites forward, the Planning Act does not allow this. They should be part of the possible allocations of the new plan Sites should not be rolled forward but should be reassessed and reallocated based on current planning policies.
- Need to allow for climate change and new technologies that come forward. The traditional industries of Newport are going to need to change. Different sites may come forward in the years ahead as they change and adapt to climate change etc. We don't know what this will look like so need to keep as much employment land as possible. Agree with protecting the Gwent Levels this should not be needed given the potential land available.
- There needs to be clarification in relation to the 77Ha and 35 Ha surplus.
- It is impossible to know if 77Ha will be appropriate for the reasons outlined above. The 77 Ha does this include the Celtic Springs Land or would this be additional.
- Brownfield land has potential for substantial biodiversity value.
- Spatial options, pepper potting development won't work due to transport issues.
- There is a need to develop sustainable communities – elevated density of housing and co-location of facilities and employment within the existing settlement boundaries. More concentrated spatial strategy, - multi modal transport.
- Possibly not all brownfield sites are suitable and therefore a mixed strategy is required.
- Needs to follow the Welsh Government "Building Better Places" agenda, advocating mixed uses in town centres. Getting the balance right will be more difficult. This would support a PDL approach. At same time provide a positive way forward with a lively city centre.
- Trying to make villages sustainable, the old UDP, early 2000s, tried this and it did not work.

- Hybrid approach would seem the most appropriate, you cannot do one or the other there needs to be a balance between the different locations and the availability of sites. Need the candidate sites to assess the spatial option to see if it possible to fulfil the strategy needs.

7 March 2023 NCC Community Councils Group

- Marshfield appears to be identified as an area of growth – there are no amenities, only one shop, no GP, no public transport, etc, there is green belt to the west. The impact of new railway station on Marshfield. *(Explained the current consultation was not identifying specific sites at this stage. Response was that city councillors had said Marshfield will be developed).*
- There is an acute housing shortage. Therefore, a dwelling led scenario would be best to address the housing issues.
- There is a need for infrastructure and services not just housing.
- There are problem issues re roads and traffic.
- There can be flood issues in some places e.g. Langstone / Magor.
- Surface water is also an issue.
- Everywhere needs housing but when considering locations it is important to look at the bigger picture and other issues/constraints, need to be joined up decision.
- Climate change is an issue, Marshfield experiences flooding.
- Large developers should be advised to put land requirements forward.
- The growth in remote working is a consideration is there a need for large employment sites where there is a need for housing especially affordable housing. Reviewing existing site allocations should be considered.
- Development of brownfield land before greenfield land.
- Don't think there would be enough brownfield land to meet the growth required. Llanwern was the biggest brownfield site, probably land available for smaller developments such as around 20 dwellings but large scale brownfield land has been depleted.
- Overall the view of the attendees was that a hybrid approach would be most appropriate.



Planning Aid Wales
Cymorth Cynllunio Cymru



NEWPORT REPLACEMENT LOCAL DEVELOPMENT PLAN: ENGAGEMENT ON GROWTH AND SPATIAL OPTIONS CONSULTATION

Dear RLDP Consultee,

Newport City Council (the Council) will be consulting on the Growth and Spatial Options for the Replacement Local Development Plan between 25th January 2023 and 8th March 2023.

The Council is currently in the process of preparing a Replacement Local Development Plan (RLDP), the Growth and Spatial Options are the next key stage in this process. The RLDP will cover the period 2021 to 2036 and identify the scale and location of new development for Newport over this period. When this new Plan is adopted, it will replace the current LDP. It will also become the framework for development, investment and infrastructure, protect the environment and be the primary consideration for determining planning applications.

The Growth and Spatial Options consultation presents different housing and employment growth scenarios and spatial distribution options. The purpose of the housing and employment growth scenarios are to introduce the different scales of growth anticipated, based on different methods or assumptions, and seek feedback to inform what the preferred growth strategy for the RLDP should be. Different spatial options are presented to provide an indication of how growth could be distributed across Newport, albeit no specific locations have been assessed at this stage.

Planning Aid Wales (PAW) has been engaged to run consultation events for Communities and Stakeholders throughout Newport during the consultation period. These events will provide more information on the RLDP process, the implications of the Growth and Spatial Options and how you can comment on the content of the Plan.

PAW is a registered charity that supports community engagement in planning in Wales. We have extensive experience of helping communities understand and have their say in the planning system. PAW recognises LDP preparation is an important avenue for securing more effective public involvement in planning.

At the events, PAW will be independent and impartial and will seek to encourage you to put forward your opinions. We will capture this information and report it back to the Council.

The schedule of planned events during the consultation period are set out below. All workshops will cover the same content and have the same format, so please register for whichever event best suits your needs and availability. To register for an event, visit the link that accompanies that event's details.

[Face to Face Events](#)

- 16 February 2023 6.30pm – 8.30pm: **Rhiwderin Community Centre**, 5 Pentre Tai Rd, Rhiwderin, Newport, NP10 8RX
Register for this event: <https://www.eventbrite.co.uk/e/newport-city-council-replacement-ldp-growth-spatial-options-consultation-registration-517368622477?aff=ebdsoporgprofile>
- 21 February 2023 2.15pm – 4.15pm: **Caerleon Town Hall**, Church Street, Caerleon, NP18 1AW
Register for this event: <https://www.eventbrite.co.uk/e/newport-city-council-replacement-ldp-growth-spatial-options-consultation-registration-517410848777?aff=ebdsoporgprofile>
- 22 February 2023 2.15pm – 4.15pm: **Ringland Community Centre**, 282 Ringland Circle, Newport, NP19 9PS
Register for this event: <https://www.eventbrite.co.uk/e/newport-city-council-replacement-ldp-growth-spatial-options-consultation-registration-517418682207?aff=ebdsoporgprofile>
- 22 February 2023 6.00pm – 8.00pm: **Pill Millennium Centre**, Courtybella Terrace Pill, Newport, NP20 2GH
Register for this event: <https://www.eventbrite.co.uk/e/newport-city-council-replacement-ldp-growth-spatial-options-consultation-registration-517445943747?aff=ebdsoporgprofile>

Online Events

- Tuesday 14th February 2023 10.30am - 12.30pm
- Thursday 23rd February 2023 2.00pm – 4.00pm
- Tuesday 28th February 2023 6.30pm - 8.30pm

Register for one of these events: <https://www.eventbrite.co.uk/e/newport-city-council-replacement-ldp-growth-spatial-options-consultation-registration-517319997037?aff=ebdsoporgprofile>

Please indicate whether you require Welsh translation for the event when you register.

If you require further assistance, please contact Mark Jones from Planning Aid Wales on 02921 660 904 or by emailing mark@planningaidwales.org.uk. For further information on the RLDP and the current consultation please visit our consultation website <https://newportrldp.co.uk/> or the Council website www.newport.gov.uk/rldp.

Yours faithfully,

Mark Jones
Planning Engagement Officer
Planning Aid Wales

CYNLLUN DATBLYGU LLEOL CASNEWYDD: YMGYSYLLTU AR YMGYNGHORIAD OPSIYNAU TWF A GOFODOL

Annwyl Ymgynghorai'r CDLIN,

Bydd Cyngor Dinas Casnewydd (y Cyngor) yn ymgynghori ar yr Opsiynau Twf a Gofodol ar gyfer y Cynllun Datblygu Lleol newydd (CDLIN) rhwng 25 Ionawr 2023 a 8 Mawrth 2023.

Ar hyn o bryd mae'r Cyngor yn y broses o baratoi CDLIN, yr Opsiynau Twf a Gofodol yw'r cam allweddol nesaf yn y broses hon. Bydd y CDLIN yn cwmpasu'r cyfnod rhwng 2021 a 2036 ac yn nodi graddfa a lleoliad datblygiad newydd i Gasnewydd dros y cyfnod hwn. Pan gaiff y Cynllun newydd hwn ei fabwysiadu, bydd yn disodli'r CDLI presennol. Bydd hefyd yn dod yn fframwaith ar gyfer datblygu, buddsoddi a seilwaith, amddiffyn yr amgylchedd a bod yn brif ystyriaeth ar gyfer penderfynu ar geisiadau cynllunio.

Mae'r ymgynghoriad Opsiynau Twf a Gofodol yn cyflwyno gwahanol senarios twf tai a chyflogaeth ac opsiynau dosbarthu gofodol. Diben y senarios twf tai a chyflogaeth yw cyflwyno'r gwahanol raddfeydd o dwf a ragwelir, yn seiliedig ar wahanol ddulliau neu ragdybiaethau, a cheisio adborth i lywio'r hyn y dylai'r strategaeth dwf a ffefrir ar gyfer y CDLIN fod. Cyflwynir gwahanol opsiynau gofodol i roi syniad o sut y gellid dosbarthu twf ledled Casnewydd, er nad oes unrhyw leoliadau penodol wedi cael eu hasesu ar hyn o bryd.

Mae Cymorth Cynllunio Cymru (CCC) wedi cael ei ymgysylltu i gynnal digwyddiadau ymgynghori ar gyfer Cymunedau a Rhanddeiliaid ledled Casnewydd yn ystod y cyfnod ymgynghori. Bydd y digwyddiadau hyn yn rhoi mwy o wybodaeth am broses y CDLIN, goblygiadau'r Opsiynau Twf a Gofodol a sut y gallwch roi sylwadau ar gynnwys y Cynllun.

Mae CCC yn elusen gofrestredig sy'n cefnogi cynnwys y gymuned mewn cynllunio yng Nghymru. Mae gennym brofiad helaeth o helpu cymunedau i ddeall y system gynllunio ac i ddweud eu dweud arni. Mae CCC yn cydnabod bod paratoi CDLI yn bwysig ar gyfer cynnwys y cyhoedd yn fwy effeithiol mewn cynllunio.

Yn y digwyddiadau, bydd CCC yn annibynnol ac yn ddiuedd a bydd yn ceisio eich annog i gyflwyno eich barn. Byddwn yn casglu'r wybodaeth hon ac yn ei hadrodd yn ôl i'r Cyngor.

Mae amserlen y digwyddiadau arfaethedig yn ystod y cyfnod ymgynghori wedi'i nodi isod. Bydd pob gweithdy yn trafod yr un cynnwys ac â'r un fformat, felly cofrestrwch ar gyfer pa bynnag ddigwyddiad sy'n addas i'ch anghenion a'ch argaeledd. I gofrestru ar gyfer digwyddiad, ewch i'r ddolen sy'n cyd-fynd â manylion y digwyddiad hwnnw.

[Digwyddiadau wyneb yn wyneb](#)

- 16 Chwefror 2023 6.30pm – 8.30pm: **Canolfan Gymunedol Rhiwderyn**, 5 Pentre Tai Rd, Rhiwderyn, Casnewydd, NP10 8RX
Cofrestru ar gyfer y digwyddiad hwn: <https://www.eventbrite.co.uk/e/newport-city-council-replacement-ldp-growth-spatial-options-consultation-registration-517368622477?aff=ebdsoporgprofile>
- 21 Chwefror 2023 2.15pm – 4.15pm: **Neuadd y Dref Caerllion**, Church Street, Caerllion, NP18 1AW
Cofrestru ar gyfer y digwyddiad hwn: <https://www.eventbrite.co.uk/e/newport-city-council-replacement-ldp-growth-spatial-options-consultation-registration-517410848777?aff=ebdsoporgprofile>
- 22 Chwefror 2023 2.15pm – 4.15pm: **Canolfan Gymunedol Ringland**, 282 Ringland Circle, Casnewydd, NP19 9PS
Cofrestru ar gyfer y digwyddiad hwn: <https://www.eventbrite.co.uk/e/newport-city-council-replacement-ldp-growth-spatial-options-consultation-registration-517418682207?aff=ebdsoporgprofile>
- 22 Chwefror 2023 6.00pm – 8.00pm: **Canolfan y Mileniwm Pilgwenlli**, Courtybella Terrace, Pilgwenlli, Casnewydd, NP20 2GH
Cofrestru ar gyfer y digwyddiad hwn: <https://www.eventbrite.co.uk/e/newport-city-council-replacement-ldp-growth-spatial-options-consultation-registration-517445943747?aff=ebdsoporgprofile>

Online Events

- Dydd Mawrth 14th Chwefror 2023 10.30am - 12.30pm
 - Dydd Iau 23rd Chwefror 2023 2.00pm – 4.00pm
 - Dydd Mawrth 28th Chwefror 2023 6.30pm - 8.30pm
- Cofrestru ar gyfer un o'r digwyddiadau hyn: <https://www.eventbrite.co.uk/e/newport-city-council-replacement-ldp-growth-spatial-options-consultation-registration-517319997037?aff=ebdsoporgprofile>

Nodwch a oes angen cyfieithiad Cymraeg arnoch ar gyfer y digwyddiad wrth gofrestru.

Os oes angen mwy o gymorth arnoch, cysylltwch â Mark Jones o CCC ar 02921 660 904 neu drwy anfon e-bost at mark@planningaidwales.org.uk. I gael mwy o wybodaeth am y CDLIN a'r ymgynghoriad presennol ewch i'n gwefan ymgynghori yma neu wefan y Cyngor yma.

Yn gywir ,

Mark Jones
Smwyddog Ymgysylltiad Cynllunio
Cymorth Cynllunio Cymru

Appendix 3 Other Information submitted to the events.

The following emails were received after two of the events from attendees:

- Email dated 14 February 2023

“This year's flooding has been the worst to date with no contribution from the Wentwood reservoir overflow.

See Flooding in Llanvaches on YouTube.

Latest TAN maps have at long last recorded the issues.

Serious A 48 flooding is also influenced by overflow from the Penhow Quarry lakes.”

This email also include a PowerPoint presentation of NCC RLDP meeting with LCC 28 June 2022

- Email received 26 February 2023

“Thank you Mark for the presentation, on Wednesday afternoon, and hope your evening event went well. It was surprising to see so few residents in attendance. I’m writing this as a resident, and not on behalf of Penhow Community Council.

I’d like to raise some points that I made during the presentation by firstly asking a question.

City or Village?

I find it difficult to determine, from Newport’s written and online outputs such as publications, documents, newsletters and leaflets, just where Penhow sits, or is regarded, in the framework of ‘Newport’. ‘Newport’ doesn’t readily acknowledge its County role in its texts. The maps show Parc Seymour as an urban Inset 7. However we’re in the Village option map. Penhow is not just Parc Seymour, and Penhow isn’t mentioned. I see ‘Newport’ as Newport City and County Council.

Communication.

As a comment on the Consultation approach, I find it clear and easily understood, but narrow in its reach, and not transparent when it needs to be. In private industry, such a consultation, where comment is requested before any practical discursive information is available, would have no chance of a successful outcome for anyone. The timing of the next opportunity to attend a consultation meeting must come after we have the candidate list, and before the Preferred strategy is defined.

We have noticeboards that inform residents of and can only show a certain amount of information. Residents’ awareness and information sources on the LDP or RLDP will be mainly through online routes of communication,

with no supporting leafleting to direct residents when key topics arise and where to look. The Press, local and National, continues to follow an opinion based editorial, on shock, alarmist or celebrity based topics, so front pages no longer lead on governance of the area often enough.

Just like the Newport Matters publication, Newsletters on the RLDP, are only available online. Articles in Newport Matters are mainly limited to Newport City, anyway, and information pertaining to the whole County is poor.

In a village of many new and long term retired residents, many of those won't have maintained their online connections if they ever had one, so I'd say out of all of the homes in Penhow we may have only a few residents reading anything regularly that 'Newport' publishes. In summary, the reach of information is very poor indeed. Families are increasingly finding homes in the village of Penhow. Their next job, their services, their education, their aspirations, depend on local information.

We have to stop thinking that children should be the route for communicating on adult sensitivities and sensibilities, using schools to get messages out. Schools are not the places to bring local, political or selective social messaging for discussion. Communication needs to be full, not partial and not depend on the eldest and youngest generations to find out and pass it on. It didn't look to me as if the Ringland Community attended in any numbers, and there were only 8 or 9 residents present from Langstone and Penhow.... And that's a key consultation affecting everyone, held in Ringland. That should ring alarm bells in any consultation process.

Transport.

We have an increasing problem with the A48. During the last bout of bad weather, our old, badly maintained drainage, couldn't cope in two places within a half mile, with flooding which contributed to several serious accidents over several days. Speed, car maintenance, and driver behaviour contributed to them, too.... although we can't say that without evidence, but we can all see it. We have narrow roads and problems with parking, we have 50mph speed signs 200 yards from a junction and outside a park, there are no traffic calming measures, no road markings. Narrow lanes used by residents are increasingly pot holed, unkempt, or blocked by delivery drivers. The traffic levels are changing, the driving behaviour is changing, the motorist is changing. 'Newport' put a drop kerb on a pavement in Parc Seymour, it took several days. residents of Newport City Homes Park in front of it most of the time. No one can see the point of the drop kerb. It wasn't what was needed, and nothing else changes.

The A48 has, in the main, a 40 or 50mph driving limit, rising to a 60mph limit in Monmouthshire's part. All residents know that means a lot of drivers will be moving at a speeds of up to 70mph and above, between the Coldra and Chepstow. Double white lines and hatched and coloured road surfaces on the A48 do not stop overtaking on it by drivers in a hurry at high speed, any more than a badly placed drop kerb makes crossing the road safer. We need a review, to look again at speed limits, pavements, paths, lanes, laybys, so that drivers and cyclists can pull out of side roads without harassment from drivers in a hurry, so that tractors can move safely, so that pedestrians can crossroads and negotiate lanes. This is before any growth or spatial options for the RLDP are considered.

We weren't considered for the fflecsi bus route, and even though it's now not available, how does that fit with an urban inset 7?

Signage.

When our village road signs fell into disrepair, we had to replace them via the Community Council from the precept. That's not something Newport City residents would accept. We cannot keep using the precept as a parish source of funding, if Newport City and County Council takes an urban view of what's needed.

Emergency Support. When we had travellers arrive, we had a very slow attendance time for representation from Newport City and County Council and again the huge effort and cost fell to the precept. The Police did nothing except make it impossible for residents to solve the problem on that day.

Criminality and Policing.

Speeding. Parking. Littering. Fly tipping.

We have no attention to any of it without incessant Report its efforts, online, to Newport City and County Council, and we are always on the back of our hard working City Councillors. We have been promised Police attention to the many off road bikes tearing through the village and the A48 on their back wheels, in excess of speed limits, making abusive gestures, so they can drive in the forest, churning it up, intimidating walkers and ruining ancient barrows. We're reduced to reporting the broken stiles, asking for Forest gates and repairs for potholes, lay-bys and banks in the lanes, as repeated piecemeal exercises rather than as part of what should be a Newport County willingness to provide routine support. I started a litter picking group, but stopped because I was pick up empty cocaine bags in the laybys on the A48. That's a policing and highways issue, if people are driving under the influence of drugs or alcohol.

Volunteers are self-supporting.

There is no amenity in Penhow that isn't run by volunteers, including our shops, Church and Chapel halls, social groups and Community Council. There are no surgeries, doctors, dentists, libraries and banks, and you'll rarely see anyone waiting in the bus stops on the A48. There is now no part time Post Office Service, and Newport needs to update its website for our postcode. Just take a look at the distances quoted for travel to services.

So, I wonder now what Newport City and County Council will do for the future for even our current infrastructure, let alone a changed one, if the RLDP outcome gives the preferred strategy as the Village option and is either business or population led. Penhow has constraints of geography, topography, amenity, natural environment and history, too.

In my short time as a Community Councillor, and relatively short time as a resident of a Penhow, I can't see Newport City and County Council assessing the viability of any new businesses and new home building effectively in Penhow, and it needs to take an immediate and serious look at what it's doing now.

New residents in Caldicot won't shop in Caldicot, it's failing rapidly. They won't like Newport City without good quality shopping, nor Chepstow for lack of parking and traffic levels, but they will maybe go to Spytty and that'll be via the A48, from which they'll soon find Newport's back roads into Cardiff. Accidents, winter weather conditions and summer traffic all impact on the A48, drivers want a quick route to work and a quicker one home.

I think change is inevitable, to support growing and changing populations, for a healthy Welsh economy. The pandemic has changed people's perceptions of themselves and expectations of others, there's no reset button. Businesses from outside Wales and from inside take up Welsh government grants but provide little long term growth. They renege on employment promises, take the funds, fail, start again.....and again....giving the Welsh economy few opportunities even to aspire to, let alone, see the community benefits of growth.

Time for a wakeup call, a bit of care, and a change of approach, before determining a growth strategy, but at least we are , as you said, in the process early, so can hopefully use a voice that has a chance to be heard, and hope for some effective listening to be done."

Newport Replacement Local Development Plan 2021-2036

Preferred Strategy

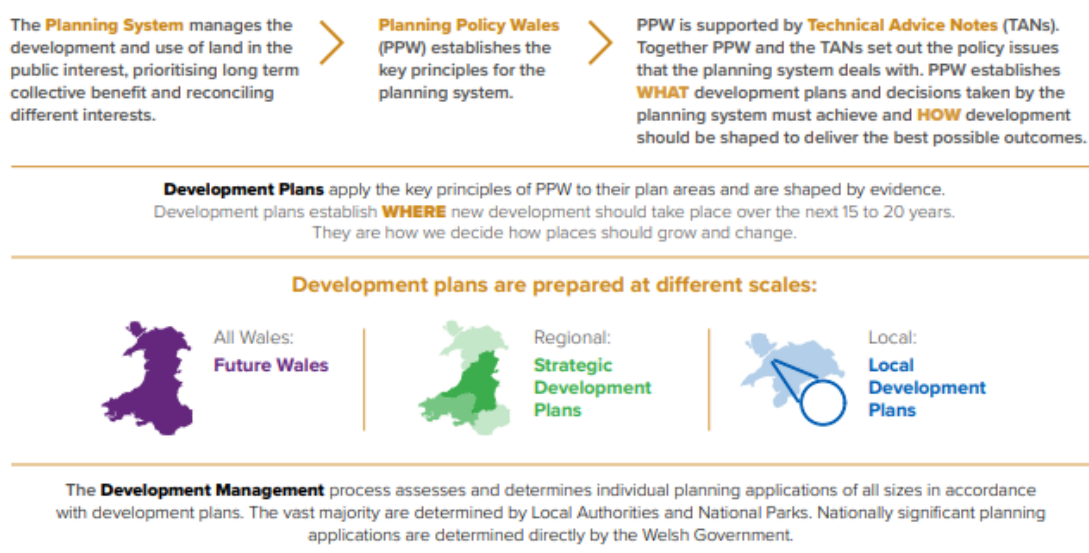
August 2023

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1 Introduction

- 1.1 The Planning and Compulsory Purchase Act 2004 (as amended) requires Newport City Council to prepare a Local Development Plan (LDP). The Council are currently preparing a Replacement Local Development Plan (RLDP), which will replace the adopted 2011-2026 LDP and guide development within Newport up to 2036. The Plan will provide a vision for Newport for how land uses will be distributed, to achieve sustainable development within Newport over the period 2021-2036. The RLDP will sit, as the adopted LDP does, within a wider framework of Development Plan documents. The highest tier of the Development Plan is Future Wales: The National Plan 2040 (Future Wales). This forms the National Development Framework for Wales covering the period 2020 to 2040. A regional tier of development plans is emerging, and it is anticipated that a Strategic Development Plan (SDP) will be prepared for South East Wales in the near future, in line with Future Wales. The RLDP is being prepared in the context of Future Wales and in the absence of the SDP. Each tier within the Development Plan addresses planning issues at a different scale and the RLDP and future LDPs will need to be in conformity with any future iterations of Future Wales and SDPs. The below image is an extract from Planning Policy Wales and shows the wider planning framework.



- 1.2 The LDP is being updated to ensure that it remains relevant and effective in light of changes to the wider planning framework and changing local circumstances, such as the need to maintain a supply of land to address development needs. A Local Development Plan is an essential local strategy which not only guides development and change in a place over a defined period, but responds to local issues such as a need for new homes, jobs, infrastructure and facilities. An up to date LDP can relieve pressure for development in inappropriate locations and supports the well-being of communities by bringing forward sustainable development. The RLDP will sit alongside a range of plans and strategies and can guide these, particularly by informing funding and investment programmes. Planning Policy Wales defines “**Sustainable Development**” as:

Improving the economic, social, environmental and cultural well-being of Wales by taking action, in accordance with the sustainable development principle, aimed at achieving the well-being goals.

Acting in accordance with the sustainable development principles means that a body must act in a manner which seeks to ensure that the needs of the present are met without compromising the ability of future generations to meet their own needs.

Structure

- 1.3 The Preferred Strategy responds and addresses the national, regional and local context; economic, environmental, social and cultural issues; the RLDP vision; RLDP objectives set out within chapters 2, 3, 4 and 5. The Preferred Growth and Spatial Strategies are set out within Chapter 6, respectively. The Preferred Strategy forms the basis of the RLDP and responds to the context outlined in prior chapters. The delivery of the Preferred Strategy is underpinned by a number of strategic policies, the delivery of the associated objectives and subsequent aims of these will be supported by development management policies and associated Supplementary Planning Guidance. The identification of sites to deliver the Preferred Strategy is a key part of this. Key Sites have been identified and are outlined in Chapter 7. Draft strategic policies are set out within Chapter 8, while the extent of proposed changes to development management policies are set out within Chapter 9.
- 1.4 Appendices to the Preferred Strategy provide a list of Supplementary Planning Documents; further national, regional and local considerations; a list of evidence base and supporting documents, including those published with the Preferred Strategy; and a list of acronyms and abbreviations.

Process and Progress

- 1.5 The Preferred Strategy consultation paper forms the Pre-Deposit Plan of the RLDP. The political approval and publications of the Preferred Strategy is a legally prescribed stage of preparing the RLDP. The purpose of this stage is to set the key elements of the strategy, including the objectives of the plan, the scale of growth and how this will be delivered, as well as the most important policies for delivering the overall strategy, including the identification of Key Sites. This forms the strategic direction for Newport over the period 2021 to 2036.

Consultation

- 1.6 This paper is subject to public consultation alongside the Candidate Sites Register, Initial Integrated Sustainability Appraisal Report and Habitats Regulations Assessment Screening. A suite of evidence and supporting technical reports have also been published and inform the Preferred Strategy.
- 1.7 Documents will be published and are available for comment for an 8-week period both electronically (Link) and in hard copy. Documents will be available to review in hard copy at the Council's Civic Centre office by appointment and at the Central Library during opening hours. Comments can be made by post or by email.

Next Steps

- 1.8 Following the close of the consultation, the LDP Team will undertake further work to refine proposals and the evidence base this includes the assessment of all other Candidate Sites, the drafting of policies for development management and the review of the LDP monitoring framework. These next steps form the next stage to developing a Deposit Plan, with publication targeted for Autumn 2024.

2 National, Regional and Local Context

Local Historic and Geographic Context

- 2.1 In order to plan for the future, it is valuable to briefly look at the past to understand how the City has developed and adapted over time. The first settlers in the Newport area arrived during the Bronze Age and evidence of this has survived to present day, particularly on the coastal levels. During the Roman occupation, Caerleon became a principal military base and substantial excavated remains can be seen, including the amphitheatre, baths and barracks occupied by the Roman Legion. In the 5th Century, the Welsh Saint, Gwynllyw, established a religious site which has adapted over history to become the St Woolos Cathedral that stands today. By the 15th Century, Newport was a notable trading port, and the discovery of a substantial medieval ship in 2002, preserved in the mud in the banks of the River Usk gives evidence of this. During the Industrial Revolution of the late 18th and 19th Centuries, Newport grew substantially, firstly with the development of the canal network and then with the railways, enabling vast quantities of coal to be exported, along with iron and steel products. Newport became the principal town of Monmouthshire, which at that time extended as far west as the Rhymney valley. Many of the fine Victorian buildings constructed in that period remain to this day, giving Newport a character which many other towns and cities have lost. In more modern times, steelmaking was a mainstay of the economy through the 20th Century, along with its port. However, much of the heavy industry in Newport went into decline. Steelmaking at the Llanwern Steelworks, for example, ceased in 2001, resulting in the loss of 1,300 jobs. The ongoing regeneration of this site continues to form a key part of redevelopment in Newport, along with other brownfield sites which have similar stories to the Llanwern Steelworks.
- 2.2 Modern day Newport is a multi-cultural city with its own unique atmosphere, where traditional industries sit alongside new electronics and financial service sectors. Standing at the gateway between England and Wales, Newport covers a geographical area of just over 73.5 square miles and is a vibrant, forward-thinking city steeped in a rich industrial heritage.
- 2.3 Newport is positioned in a vital location between Cardiff and Bristol, having a strategic role between these larger cities. The local authority area comprises a mix of urban and rural land uses, with a main urban area which is situated around the M4 corridor, particularly to the southern side of the motorway. Villages and rural communities are apparent in all directions around the urban area. Road and rail links stretch from west to east and to the north, linking to neighbouring authorities of Cardiff, Monmouthshire, Torfaen and Caerphilly. There is some separation between the urban area of Newport and the built form of Cardiff's administrative area the west, where development is broadly apparent up to the local authority boundary.
- 2.4 Newport is a coastal location, with the Severn Estuary positioned to the south of the City. The Gwent Levels form an integral landscape and strategic constraint, which is subject to environmental designations. Flood risks arising from the sea further constrain in this area and the rural communities situated to the south of the City. Some of these issues stretch northerly along the River Usk, which dissects the west and east of the City, impacting some more urban communities.
- 2.5 During the period 2011 to 2021, Newport experienced the highest rate of population growth in Wales, increasing by 9.5% to 159,600 people. The result is that, as of the 2021 Census, the local authority area is the second most densely populated area in Wales. Welsh Indices of Multiple Deprivation indicate that the urban area of the City is made up of a number of Lower Layer Super Output Areas falling to the top 20% most deprived communities.

National Context

- 2.6 The Replacement Local Development Plan is being prepared within the context of a range of Welsh national policies, strategies and legislation. The purpose and implications of these are outlined in more detail in Appendix 2.

- 2.7 **Future Wales: The National Plan 2040** (Future Wales) forms part of the Development Plan, sitting above the Local Development Plan as the National Development Framework. Key relevant policies are identified. The importance of these can be summarised as:
- 2.8 **Policy 1 Where Wales will grow** Defines the South-East Region as an area of national growth, requiring authorities in the region to make a provision for a level of growth commensurate to the national growth area status. This is re-affirmed in the regional Policy 33 – National Growth Area – Cardiff, Newport and the Valleys, which addresses the development requirements in the region.
- 2.9 **Policy 2 Shaping Urban Growth and Regeneration Strategic Placemaking** - Requires Placemaking to be at the heart of every development and urban growth. Planning authorities should use development plans to establish a vision for each town and city. This should be supported by a spatial framework that guides growth and regeneration, and establishes a structure within which towns and cities can grow, evolve, diversify and flourish over time.
- 2.10 **Policy 3 Supporting Urban Growth and Regeneration Public Sector Leadership** - Sets out the national policy for enabling the delivery of urban growth and regeneration. Insomuch that the Welsh Government will assemble land, invest in infrastructure and prepare sites for development. Making sure that the public sector takes a leadership role and will apply placemaking principles to support growth and regeneration. Planning authorities are required to collaborate with Welsh Government and other public sector bodies to identify opportunities.
- 2.11 **Policy 4 Supporting Rural Communities** Local Development Plans must identify their rural communities, address their needs and set out policies to support them.
- 2.12 **Policy 5 Supporting the rural economy** Local Development Plans must plan positively to meet the employment needs of rural areas including employment arising from the foundational economy; the agricultural and forestry sector, including proposals for diversification; start-ups and micro businesses.
- 2.13 **Policy 6 Town Centre First** Sets out a town centre first approach to the delivery of large scale development, requiring exploration of inner city opportunities ahead of greenfield consumption. The sequential approach is to be applied and Local Development Plans need to identify the best locations for retail and commercial uses.
- 2.14 **Policy 7 Delivering Affordable Homes** Reaffirms Welsh Government's aspiration to deliver affordable housing. Local Development Plans planning authorities should develop strong evidence based policy frameworks to deliver affordable housing, including setting development plan targets based on regional estimates of housing need and local assessments. In response to local and regional needs, planning authorities should identify sites for affordable housing led developments and explore all opportunities to increase the supply of affordable housing.
- 2.15 **Policy 8 Flooding** Supports flood risk management that facilitates sustainable economic and national growth, promoting nature based solutions and seeking to maximise social, economic and environmental benefits from flood risk management infrastructure. Flood risks are a significant strategic constraint for existing communities and the wider landscape in Newport.
- 2.16 **Policy 9 Resilient Ecological Networks and Green Infrastructure** Reaffirms Welsh Government's priorities towards the enhancement of biodiversity, upgrading the resilience of ecosystems and the overall provision of green infrastructure. Planning authorities should include these areas and/or opportunities in their development plan strategies and policies in order to promote and safeguard the functions and opportunities they provide. The Gwent Levels have been identified at a national level as an "Ecosystem Service Hotspot" due to it being an ancient landscape with a special cultural significance. This area is also important for biodiversity, recreation, flood alleviation, carbon storage and food production.

- 2.17 **Policy 11 National Connectivity** The Welsh Government will support and invest in improving national connectivity, including for a transition towards longer trips being undertaken by public transport. Planning authorities are asked to support proposals to improve national connectivity and maximise opportunities arising from them. They are required to ensure that new development contributes towards the improvement and development of the National Cycle Network and associated links.
- 2.18 **Policy 12 Regional Connectivity** Sets out the Welsh Government's commitment to improving and increasing sustainable transport and requires authorities in the national growth area to plan growth to maximise opportunities arising from investment in public transport. Planning authorities must maximise opportunities arising from investment, including higher density, mixed-use and car free developments around metro stations. They must support the active travel network and reduce levels of car parking in urban areas.
- 2.19 **Policy 13 Supporting Digital Communications** Supporting provision of digital communications infrastructure and services across Wales, including the identification of policies within Local Development Plans to address future needs for digital infrastructure.
- 2.20 **Policy 15 National Forest** Outlines the need to protect and safeguard National Forest areas across Wales.
- 2.21 **Policy 16 Heat Networks** Specifically identifies Newport city as a location for the consideration of a district heat network. Requiring the identification of opportunities and positive planning for their implementation.
- 2.22 **Policy 33 National Growth Area Cardiff, Newport and the Valleys** Identifies a role and function for Newport, along with Cardiff and the Valleys, as a focus for sustainable national growth. Future Wales requires the RLDP to recognise the National Growth Area as a focus for strategic economic and housing growth. In line with Future Wales, it is anticipated that Newport will be a location where there will be growth in employment and housing opportunities and investment in infrastructure as a part of the urban cluster within South East Wales. The growth strategy taken forward by the RLDP should therefore support continued growth within Newport to maximise opportunities to fulfil this role up to 2036 and beyond.
- 2.23 **Policy 34 Green Belts in the South East** Welsh Government requires the identification of a Green Belt by a Strategic Development Plan for the region to manage urban form and growth. The RLDP cannot determine the boundary of the Green Belt. However, the policy also includes the requirement that local authorities should not permit or allocate development in areas shown for consideration for Green Belts.
- 2.24 **Policy 36 South East Metro** provides a regional policy basis for the development of the Metro and for Metro focused developments. Newport in particular will need to support schemes and projects associated with the South East Wales Metro, including through planning growth and regeneration in a way that maximises opportunities arising from better regional connectivity. Specifically, this includes identifying opportunities for higher density, mixed-use and car free development around new and improved metro stations. The overall aim is to reduce the need to travel, particularly by private vehicles, and support a modal shift to walking, cycling and public transport. Policies 11 and 12 set out the strategic approach to national and regional connectivity and how the Welsh Government will support and invest in improvements to active travel and public transport. The South East Wales Transport Commission's advice on how to tackle congestion on the M4 supports this policy's focus on planning development around the public transport network, not the motorway.

Covid-19 Pandemic

- 2.25 The Covid-19 health emergency has posed significant and unprecedented challenge and the long-term impact on businesses and society. The RLDP takes a role in economic and social recovery. Of note is the way in which working patterns have changed, along with how people shop, work, travel and use open space.

Strategic Development Plans

- 2.26 In line with Future Wales, a Strategic Development Plan (SDP) will be prepared for the South East Wales region by the 10 Local Authorities. These align with the Corporate Joint Committee which comprises Newport, Blaenau Gwent, Bridgend, Caerphilly, Cardiff, Merthyr Tydfil, Monmouthshire, Rhondda Cynon Taf, Torfaen and Vale of Glamorgan.
- 2.27 The SDP will address regional issues such as regional housing needs, employment and transport. As well as addressing other strategic issues regarding infrastructure and waste management. A governance framework to support a Corporate Joint Committee was established in early 2023 and it is anticipated that the preparation of a South East Wales Strategic Development Plan will continue to gather traction, but there is a high likelihood that it will be adopted later than the RLDP.
- 2.28 Several issues have been considered at a regional level following the publication of Future Wales. Where technical evidence has been produced, this is included within the evidence base. These set out a regional position, informing the preparation of the RLDP, in the absence of a SDP to address cross boundary and regional issues.

Cardiff Capital Region and City Deal

- 2.29 In 2017, the UK Government 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. The £1.2bn funding comprises an investment fund to support new and enhanced transport infrastructure, opportunities for the growth of the compound semiconductor industry, skills development, employment support and a partnership approach to housing and regeneration. The deal seeks to support 25,000 new jobs between 2017-2040, an increased Gross Value Added and increased private investment over the period 2020-2040.

South East Wales Metro

- 2.30 The development of a metro to transform public transport in South Wales is a key project arising from the Cardiff City Region Deal. The Burn’s Report provided a number of recommendations regarding projects and opportunities related to delivering this, including short, medium and long term priorities. It is a substantial and ambitious programme which is supported by Policy 36 of Future Wales. Transport for Wales has a key responsibility as the operators of metro rail services, while bus and active travel routes will also form part of the wider network.
- 2.31 A number of additional regional and larger than local strategies have been identified within Appendix 3.

Neighbouring Local Planning Authorities

Local Authority	Adopted LDP	Replacement LDP Process
Cardiff City Council	Adopted their LDP on 28 January 2016. The LDP has a plan period of 2006-2026.	Cardiff consulted on a Preferred Strategy during Summer 2023.
Caerphilly County Borough Council	Adopted their LDP on 23 November 2010. The LDP has a plan period of 2006-2021.	Caerphilly consulted on a Preferred Strategy and have paused following an objection from Welsh Government and work is ongoing to resolve this while awaiting evidence of regional housing needs.
Torfaen County Borough Council	Adopted their LDP in December 2013. The LDP covers the period 2013-2021.	Torfaen Council recently resolved to withdraw and restart their plan making process in August 2023 and will plan for the period 2022-2037.
Monmouthshire County Council	Adopted their LDP on 14 February 2014. The LDP has a plan period of 2011-2021.	Monmouthshire consulted on a new Preferred Strategy and are progressing towards publishing a Deposit Plan in Spring 2024.

- 2.32 Newport is a member of the South East Wales Strategic Planning Group (SEWSPG) and continues to develop evidence across the ten local authorities to understand cross boundary interrelationships and inform development planning policies and decision making.

Preferred Strategy

Gwent Well-being Plan

- 2.33 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, which was merged with five PSBs to form the Gwent PSB in 2021. The Gwent Well-being Plan was published in August 2023 following approval from all statutory partners. A detailed delivery plan will be developed by the PSB. The One Newport partnership's role is now as a delivery body, implementing a local action and delivery plan for Newport.
- 2.34 The Gwent Well-being Plan integrates the Marmot Principles, setting out two overarching objectives for the region to create a fairer, more equitable and inclusive Gwent for all and a climate-ready Gwent, where our environment is valued and protected, benefitting our well-being now and for future generations. Steps needed to achieve these are outlined as action to reduce the cost of living crisis in the longer term; provide and enable the supply of good quality, affordable and appropriate homes; action to reduce carbon emissions, help Gwent adapt to Climate Change, protect and restore the natural environment; action to address inequities, particularly in relation to health, through the framework of the Marmot Principles; enable and support people, neighbourhoods, and communities to be resilient, connected, thriving and safe.

Local Policy

Corporate Plan 2022-2027

- 2.35 The Newport Corporate Plan (2022-2027) builds upon the achievements and responses to the challenges faced as Newport moves forward from the Covid-19 pandemic, responds to the cost-of-living crisis, and creates opportunities for all of Newport's communities to become stronger, fairer, and greener. The Plan sets out four well-being objectives regarding economy, education and skills, environment and infrastructure, quality social care and community services and an inclusive, fair and sustainable council. The Plan identifies the Replacement Local Development Plan as supporting economic growth and placemaking across communities to achieve economic objectives as well as being able to support the achievement of other objectives where land use is interrelated i.e. improved or new education and skills facilities.
- 2.36 The corporate plan is supplemented further strategic plans which set out local objectives and influence the RLDP either through assessments or proposals, these are:
- 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) is required under the Equalities Act (2010) to set out equality objectives to promote equality across the city. The Integrated Sustainability Appraisal incorporates an Equalities Impact Assessment considering this in more detail.
 - The Welsh Language Strategy (2022-2027) builds on the 2017-2022 strategy and sets out a vision for the Welsh Language as 'See, Hear, Learn, Use, Love – Everyone in Newport can use, see and hear Welsh as a living language in all parts of life across the city'. This sets out a vision that 'the people of Newport can use Welsh in all parts of life'. The Integrated Sustainability Appraisal incorporates a Welsh Language Assessment considering this in more detail.
 - The Climate Change Plan 2022-2027 is an organisational Climate Change Plan setting out themes, actions and priorities to achieve priorities the organisations net zero targets. There are links between the Plan and the Replacement Local Development Plan across a number of themes, including transport, renewable energy and health.

Local Area Energy Plan 2022

Preferred Strategy

2.37 The Local Area Energy Plan presents the Council's vision for a net zero local energy system in Newport, together with a summary of the evidence to support the vision and a route map to get there, including a set of actions for the Council, whilst recognising the role of other key actors in government, the energy sector and across the community.

2.38 A number of additional local plans and strategies have been identified in Appendix 4.

Placemaking Wales Charter

2.39 The Council is a signatory of 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.

Healthy Travel Charter

2.40 The Healthy Travel Charter for Gwent is made up of 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 Zero 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.

2.41 Other Council Plans and Strategies can be found in Appendix 4.

3 Issues, Challenges and Opportunities

- 3.1 The following issues, challenges and opportunities have been informed by the national, regional and local context. A number of issues have informed the development of the vision, objectives and preferred strategy. These are set out in full in the Issues, Vision and Objectives background paper. These are summarised as the following Key Issues and are grouped by national and regional, economic, environmental, social and cultural:

National and Regional

- 1) Newport has a nationally important role and an increasing strategic role as a National Growth Area. The City forms part of the Cardiff Capital Region and Western Gateway.
- 2) Transport capacity issues, with the South East Wales Metro and the recommendations of the Burn's Report forming an opportunity to address issues as well as support modal shift through new and enhanced active and public travel infrastructure.
- 3) Need to protect nationally and international environmental and historic designations, including Regionally Important Geodiversity Sites.
- 4) Managing strategic flood risks, including the effects of climate change, in line with national policy.
- 5) Mitigation, adaptation and resilience building to the causes and impacts of climate change to meet national targets, including supporting the growth of the National Forest.
- 6) Maintaining separation from surrounding urban areas such as Cardiff and Cwmbran through the Green Belt.
- 7) Welsh Government target to achieve net zero waste by 2050.

Economic

- 8) Need to identify a suitable amount of land to meet the requirement for 77ha of employment land identified by the evidence base.
- 9) Opportunity to support upskilling and education of the local population. Including maximising opportunities to meet skills gaps in delivering solutions to the climate change challenge.
- 10) Support growth of the rural economy, including sustainable tourism.
- 11) Supporting Covid-19 post-pandemic and Brexit economy recovery, including addressing the changing roles of retail and commercial centres and supporting the vitality of Newport City Centre, which has been accelerated by external economic challenges.
- 12) Maximise economic opportunities through historic environment, including through culture, tourism and regeneration. One challenge is the need for investment in managing, protecting and enhancing these.

Environmental

- 13) Maintaining a brownfield-led strategy is a challenge and the identification of greenfield sites will require the identification of appropriate infrastructure, e.g. active travel routes, to support connectivity and alleviate impact on roads.
- 14) Need to support the sustainable management of natural resources, including energy, trees, minerals and waste, in line with Natural Resource Wales policies and Area Statements.
- 15) Reducing resource consumption and promoting circular economies, including ensuring the recycling of materials and sustainable sourcing of minerals.
- 16) Protection of Best and Most Versatile Agricultural Land.
- 17) Efficient use and improvements to the quality of water resources.
- 18) Overcoming air quality issues, reducing impacts from transport, fuel consumption and agriculture.
- 19) Addressing the local climate change and ecological emergencies to meet local targets and ecosystem resilience.
- 20) Maximising opportunities for biodiversity enhancement and net gain, as well as explore opportunities for existing and new green infrastructure corridors to improve connectivity, particularly within urban areas.
- 21) Preserving and enhancing landscape features and protection Special Landscape Areas for their special characteristics.
- 22) Consider a settlement hierarchy, urban and village boundaries, and opportunities for development in rural areas.
- 23) Consider whether the current Green Wedge designations be preserved, amended or removed.
- 24) Combatting pressure from development in the coastal area and levels due to their outstanding visual, historic and ecological interest.
- 25) Promote energy from low carbon sources to address demand for heating and transport, including exploring opportunities for district heat networks, encouraging more energy efficient buildings and supporting more renewable and low carbon energy production schemes.

Social

- 26) Need to address housing requirements arising from forecast population growth and identify a suitable amount of land to support these. This includes understanding shortfalls in delivering the 2011-2026 LDP requirements.
- 27) Delivery of a diverse range of new homes of different types and tenures in different locations, addressing specific needs, affordable housing needs and accessibility to all.
- 28) Identification of needs for Gypsy and Traveller accommodation and delivery necessary accommodation.
- 29) Ensuring development takes place in sustainable locations, supported by the necessary social, environmental and physical infrastructure, including employment opportunities.
- 30) Need to support the provision, protection and improvement of open spaces, play spaces and sporting facilities, as well as supporting the provision of the green infrastructure networks.
- 31) Reducing the need to travel and encouraging sustainable travel choices is a challenge and opportunity.
- 32) Negating the polluting impacts of development is important for avoiding impacts on health.
- 33) Creating safer environments and decreasing opportunities for crime.
- 34) Promote regeneration for benefits of addressing deprivation and supporting the foundational economy.
- 35) Ensuring the consideration of health and well-being in decision making, including supporting a reduction in health inequalities.
- 36) Delivering local services and facilities to meet day to day needs of communities in accessible locations.
- 37) Support improved access to education and training opportunities to bring levels more in line with Wales as a whole.
- 38) Tackling fuel poverty through supporting the transition to net zero and decarbonisation.
- 39) Resilience and protection for existing and new communities against the impacts of climate change, specifically flooding.

Cultural

- 40) Promotion of placemaking in planning and design to support balanced communities, foster a shared sense of place, and promote community cohesion for both new and existing communities.
- 41) Addressing the needs of a multilingual city and providing opportunities to enhance and protect the Welsh language. Opportunities may include providing access to key community and educational services, good quality homes and jobs, and promotion of Welsh heritage through the preservation and restoration of key cultural areas/features.
- 42) Supporting conservation and enhancement of historic buildings and structures for architectural and historic interest due as they are sources of pride and part of cultural identity. This includes Conservation Areas and other locally defined heritage assets aid our understanding and appreciation of place.
- 43) Securing the conservation and enhancement of archaeological remains, and archaeologically sensitive areas, and support the undertaking of archaeological investigations.

4 Vision

- 4.1 Every LDP requires an overarching Vision which clearly sets out what it is trying to achieve over the period 2021-2036. It should set a positive aspirational tone whilst also addressing the specific local needs and challenges for the area. The Vision will then subsequently inform the Objectives of the Plan to address the identified issues, challenges and opportunities for Newport in further detail. The following Vision has been drafted having regard for the latest National Policy, in addition to Council's LDP Review Report, the Integrated Sustainability Appraisal (ISA) Scoping Report, and Newport's Well-being Plan. This is considered a well-balanced foundation to inform the Replacement Local Development Plan and has been amended to take account of initial feedback.

Replacement Local Development Plan Vision

Newport will be a destination where people will want to live, work and visit:

- ❖ A strategically significant City which will contribute towards the national growth of Wales.
- ❖ A City that tackles inequality through sustainable patterns of development, creating places that are safe, connected, inclusive, healthy, and well designed with access to housing, jobs, services and the natural environment.
- ❖ A City that promotes and protects its historic assets, diverse cultures and languages.
- ❖ An economically thriving City which supports and attracts business and industry at all scales, particularly where they focus on sustainable, innovative and technologically leading practices, which contribute towards cultivating a skilled and adaptable workforce.
- ❖ A resilient City which sustainably manages its natural resources, protecting and enhancing the biological and ecological values of the natural environment, including the benefits of ecosystem services, in a carbon neutral and climate responsible manner.

5 Objectives

- 5.1 The overall goal of achieving the Vision of the Plan can only be reached by the delivery of a number of objectives which seek to address the key issues facing Newport, as identified above. Links to Well-being Goals set out by the Well-being of Future Generations (Wales) Act 2015 and the Key Planning Principles and National Sustainable Placemaking Outcomes (KPP and NSPO) of Planning Policy Wales edition 11 have been identified alongside links to Preferred Strategy issues.

1. Economy and Employment Provide for Newport's economic growth by offering a diverse range and choice of new and improved employment opportunities, which are adaptive to change and meet the needs of Newport and beyond, supporting a strong skilled and resilient workforce.		
Links to Well-being Goals: 1, 2, 4, 5, 7	Links to KPP and NSPO: 1, 2, 3, 4	Links to Issues: 1, 8, 9, 10, 11
2. Population and Communities To provide high-quality homes that meet the needs of Newport, as a national growth area, and to ensure that these homes are supported by the necessary social, environmental, cultural and physical infrastructure to provide safe and healthy places for people that maintain and enhance community and settlement identities		
Links to Well-being Goals: 1, 2, 3, 4, 5, 6	Links to KPP and NSPO: 1, 2, 3, 4	Links to Issues: 26, 27, 28, 29, 38, 39,
3. Health and Well-being To improve health and well-being through the creation of well-connected, accessible, healthy and active places, tackling health and socio-economic inequality through sustainable growth.		
Links to Well-being Goals: 1, 2, 3, 4, 5, 6	Links to KPP and NSPO: 3, 4	Links to Issues: 30, 31, 32, 33, 34, 35
4. Equality, Diversity, and Inclusion To create quality positive places where development realises the multiple benefits from the creation of inclusive, connected, adaptable and accessible communities that are cohesive and where Newport's culture, including the Welsh language, is valued and promoted.		
Links to Well-being Goals: 1, 4, 5, 6	Links to KPP and NSPO: 1, 3, 4	Links to Issues: 27, 34, 36, 37, 40, 41
5. Transport and Movement Reduce the need to travel and increase the use and provision of sustainable travel options.		
Links to Well-being Goals: 1, 3, 4, 5, 7	Links to KPP and NSPO: 1, 2, 3, 4	Links to Issues: 2, 6, 13, 31
6. Natural Resources Sustainably manage the natural resources in Newport to meet the needs of present and future communities, by ensuring resource efficiency, improved health outcomes, and the creation of a successful circular economy and green growth.		
Links to Well-being Goals: 1, 2, 3, 7	Links to KPP and NSPO: 1, 2, 5	Links to Issues: 3, 6, 14, 15, 16, 17, 18
7. Biodiversity and Geodiversity To maintain, enhance and improve the biodiversity and geodiversity of Newport and its surrounds, including improved ecological resilience, diversity, connectivity and adaptability, whilst ensuring net benefits are facilitated from development.		
Links to Well-being Goals: 2, 7	Links to KPP and NSPO: 2, 5	Links to Issues: 3, 19, 20
8. Historic Environment To preserve, enhance and realise the value of Newport's heritage resources, through investment, interpretation and maximisation of those opportunities provided by the distinctive historic environment and archaeological assets.		
Links to Well-being Goals: 5, 6, 7	Links to KPP and NSPO: 4, 5	Links to Issues: 3, 12, 42, 43
9. Landscape To protect and enhance the quality and character of Newport's landscape, townscape and seascape, and maximise the opportunities these features offer.		
Links to Well-being Goals: 2, 3, 6, 7	Links to KPP and NSPO: 2, 5	Links to Issues: 21, 22, 23, 24
10. Climate Change To ensure that development and land uses in Newport are resilient to the effects of climate change, and actively tackle the causes and impacts of climate change through minimisation, adaptation and mitigation.		
Links to Well-being Goals: 1, 2, 3, 4, 7	Links to KPP and NSPO: 1, 2, 3, 5	Links to Issues: 4, 5, 7, 9, 19, 25, 38, 39

6 Preferred Strategy

6.1.1 The Preferred Strategy has been identified to deliver the vision and objectives, addressing the issues, challenges and opportunities. The Preferred Strategy comprises the scale of housing and employment growth that will be delivered over the period 2021-2036 and the approach that will be taken to delivering this. The 2011-2026 LDP supported a successful delivery strategy that has been able to support the redevelopment of much of Newport's stock of previously developed land. The vision and objectives indicate overarching priorities for the RLDP of supporting the City's growth creating opportunities for existing and new communities, strengthening the economy and managing Newport's sensitive built and natural environment.

6.2 Preferred Scale of Growth

6.2.1 The preferred growth strategy is drawn from past delivery rates over a 10 year period, taking account of delivery between 2010/11-2019/2020 and excluding covid years where housing delivery and employment growth slowed as a result of the Covid-19 Pandemic. This has been assessed alongside other demographic scenarios and is considered to provide a consistent scale of growth as the growth strategy adopted by the 2011-2026 LDP. This scale of growth is considered to be the most appropriate for the 2021-2036 plan period as it supports continued growth following on from a ten-year period where the previous strategy was able to support Newport's leading role within Wales, having had the highest population growth. Taking a ten-year period into account provides benefits of being able to balance out peaks and troughs in housing delivery, which is inevitable during a plan period, particularly in the face of external forces. The outcome is a housing requirement which contributes to Newport's principal role with the South East Wales National Growth Area and can balance positive opportunities for new growth, while respecting local constraints to development, in line with the RLDP vision.

6.2.2 Meeting the requirement identified is essential for meeting local housing needs and continued growth within the City, supporting Newport's role within the wider region. Delivering on the identified requirement will help to create a Newport where people want to live, work and visit. Initially, a flexibility allowance of 10% is proposed to provide resilience to the housing land supply to support a maintained supply throughout the plan period. A flexibility allowance 10% is a starting point outlined by the Development Plans Manual, any uplift to this will be carefully considered and applied to the requirement, where appropriate. The flexibility allowance provides resilience to ensure that an overall housing requirement of 9,570 is met over the plan period. Applying this allowance means that the RLDP will identify land for at least 10,530 homes.

6.2.3 The scale of housing growth in Newport creates an opportunity for additional jobs and economic growth both in existing sectors and emergent industries that will develop over the lifetime of the plan, particularly associated Newport's high potential and priority sectors. Job growth is coupled with population projections to determine a minimum target for job growth alongside housing growth, the target for job growth relates to all jobs created, while the employment land requirement relates to the provision floorspace falling into the B Use Class. Forecasts do not always provide a direct correlation between housing and job growth, but there is a need to ensure a balance between new homes and jobs to support Newport's role as an investable proposition for business and to achieve its long-term economic potential.

6.2.4 The Employment Land Review 2022 recommends forecasting the employment land requirement on the basis of past delivery rates. When incorporating economic forecasts the projected land needs were generally negative as these assume decline of some existing industries and the repurposing of employment land to meet changing demand. Taking an approach based on past delivery indicates opportunities to support new and different types of employment, while protecting existing employment areas for B-Class uses. Taking this approach results in the proposed baseline requirement for 62ha of new employment land, including a flexibility buffer. A further 15ha has been incorporated as an uplift to reflect the Larger Than Local Regional Employment Study, which looks to address employment needs arising across local authority boundaries, including strategic level investment in regional employment strategies and industry clusters. Delivering the employment land requirement and supporting new jobs will enable those living in Newport to access education and employment through a range of industries and businesses as a part of a thriving economy.

PS1 Scale of Growth

To support Newport's vision as a destination where people want to live, work and visit, the plan will make provision for:

- ❖ **10,530** homes to deliver a housing requirement of **9,570**; and
- ❖ **87.5ha** of employment land to meet an employment land requirement of **77ha** and minimum of **8,640** new jobs.

6.3 Preferred Spatial Strategy

- 6.3.1 New development and redevelopment will be delivered in a number of ways. The preferred spatial stage seeks to prioritise the redevelopment and regeneration of land within the urban area, including the regeneration of the former Llanwern Steelworks at Gian Llyn and the former Whitehead Works for residential led developments. Redevelopment within the urban boundary is to be supplemented by development of a range of scales, in appropriate locations on the edge of the urban area. The approach taken will maximise opportunities within the urban area, whilst supporting a growing City. It is also acknowledged that while development will be focused towards the urban area, new growth may be necessary to supporting sustainable rural communities. As a result, the settlement hierarchy is made up of two tiers, these are the urban area and defined villages. Defined villages are the rural communities outside of the settlement boundary which have been assessed as being less constrained and more self-sufficient in terms of access to services and facilities, such as public transport and schools. Other rural communities exist within the open countryside, but are not subject to defined development boundaries to avoid placing development pressures in these less sustainable locations. The outcome is that development is to be delivered through a mixed strategy with development occurring in a more balanced way across previously developed land and greenfield sites.
- 6.3.2 Policy PS8 sets out how the employment land requirement will be addressed, with the need for jobs being met through a range of employment and commercial land uses. A number of sites have been identified to support B Class uses on sites where the allocation for employment purposes is proposed as being 'rolled over'. The locations of these development sites are consistent with Policy PS2 and provide very good opportunities for economic investment, new employment and excellent potential for new skills and training opportunities.
- 6.3.3 The Council has undertaken an Urban Capacity Study, which builds an understanding of development opportunities within the existing settlement boundaries. This Study sits alongside the Candidate Site Register and existing development commitments to provide an understanding of the Council's capacity to redevelop Previously Developed Land (PDL). Findings indicate that the availability of readily developable PDL sites is decreasing in Newport. An assessment of the Council's housing land supply is broken down in Table 1. This indicates a remainder of 4,700 additional dwellings to be identified on new sites in the Replacement Local Development Plan. These will be on Key Sites¹, identified in the next chapter, and other sites with a capacity of 10-299 dwellings.
- 6.3.4 It is unlikely that new development will be acceptable within the open countryside, however there may be some circumstances where a specific need can be demonstrated. The countryside surrounding Newport is subject to a number of sensitive constraints and protections, addressing these through other policies of the Development Plan as well as ensuring the appropriate scale and design of development will be key.
- 6.3.5 Analysis has been undertaken to inform an understanding of housing supply in Newport has informed the spatial strategy, with Table 1 providing a breakdown of supply. A non-delivery allowance has been applied to the 'land bank'. The Land Bank is the number of homes yet to come forward on sites with planning permission and allocated sites without planning permission. A non-delivery allowance of 64% has been applied as this proportion accounts for the number of homes on 2011-2026 LDP strategic allocations, which are not yet subject to detailed planning permission, suggesting some uncertainty in these units being delivered. This 64% is a proportion of the sites without planning permission as of April 2021, shown in row D of Table 1. Table 2 provides a list of commitments and make up B, C and D of Table 1².

¹ Key Sites have been defined as sites able to deliver 300 dwellings or more as these are considered to make the widest contribution to placemaking objectives in Newport.

² These are indicatively shown on the Key Diagram. Further details relating to these can be found in the Housing Supply Background Paper.

6.3.6 Using the understanding of housing in the pipeline set out within Table 1, a residual requirement can be calculated. This provides the figure of additional dwellings which need to be identified. The remaining amount to be identified will be allocated through the identification of key sites, large sites and smaller sites of up to 100 dwellings, where appropriate. Table 3 outlines the remainder, this is found by subtracting the total housing supply from the housing requirement, incorporating the flexibility allowance.

6.3.7 Table 3 indicates that land for a further 4,680 homes is to be identified to address the housing requirement over the period 2021-2036. These are to be identified in line with the spatial strategy. Chapter 7 outlined the Key Sites which have been identified as potential allocations, together these have the potential to provide up to 2,850 homes during the 2021-2036 plan period. When discounted from the Residual Balance, this leaves a further 1,830 homes to be identified on sites of 10-299 predominately within and on the edge of the urban boundary, with a small proportion being directed towards defined villages where development will need to be in fitting in scale to the local area and contribute to local placemaking.

Table 1: Components of Housing Supply		
A	Total Completions since 1 st April 2021 to 31 st March 2023	1,067
B	Dwellings currently under construction (as at 1st April 2023)	433
C	Units remaining on sites currently under construction (as at 1st April 2023)	1,746
D	Sites currently not under construction but expected to complete prior to 2037	2,554
		Total Land Bank (Total of B, C and D): 4,733
E	Large windfall sites (10 or more units)	1,023
F	Small windfall sites (under 10 units)	663
G	Non-delivery Allowance ³ (64% of D)	1,635
		Total Housing Supply (A+B+C+D+E+F-G): 5,851

³ Based on 1,640 units of the Land Bank without detailed permission on strategic sites allocated in the 2011-2026 LDP. It is anticipated that this allowance will decrease as the preparation of the Replacement Local Development Plan progresses and more certainty is established.

Table 2: Committed Housing Supply			
Site Name and H1 Reference (where applicable)		Ward	Units Remaining (April 23 base)
H5	Glebelands	St Julians	60
H51	Whitehead Works	Pillgwenlly	437
H3	Llanwern Village -	Llanwern	203
H47	Glan Llyn	Llanwern	1039
H62	Former Queens Hill School	Allt-Yr-Yn	76
	Caerleon Campus	Caerleon	194
	West And South Of Mandrake House, Jubilee Park	Rogerstone	35
	11-13 Skinner Street	Stow Hill	12
	Victoria Inn, 2 Nash Rd	Lliswerry	18
H45	Lysaghts Parc	Lliswerry	18
	1 Mountbattern Close	Ringland	12
H8 + extra area	Seven Stiles, Aberthaw Rd	Always	39
	14 To 20 Stow Hill, Newport	Stow Hill	36
(Rows B+C) Sites currently under construction (as at 1st April 2023) Total: 2179			
H23	Traston Lane	Lliswerry	21
H36	Farmwood Close*	Always	59
H15	Victoria Wharf (Edward Ware)	Pillgwenlly	122
H52	Land SW East Dock Road,	Pillgwenlly	149
H3	Llanwern Village - Remainder	Llanwern	400
H47	Glan Llyn (Remainder) Former Llanwern Steelworks	Llanwern	1240
H10	Pencoed Castle	Langstone	12
	40 Stow Hill	Stow Hill	37
	Robert Price Transport Yard, Corporation Rd	Lliswerry	62
	75 - 76 Lower Dock Street	Pillgwenlly	12
	Baneswell Community Centre	Stow Hill	19
	104 And 105, Lower Dock Street,	Pillgwenlly	15
	133 To 135, Commercial Street	Stow Hill	22
	Telford St	Liswerry	54
	Fern Club, 57 Liswerry Road	Liswerry	20
	Ringland Centre, Retail & Resi	Ringland	38
	Ringland Centre, Resi	Ringland	94
H32	Former Sainsburys Site	Shaftesbury	140
H31	Roman Lodge Hotel, Ponthir Road	Caerleon	10
H59	24 Crawford Road	St Julians	10
H64	Uskside Paint Mills/Coverack Road	Victoria	53
(Row D) Sites with planning consent, (not Started) expected to complete prior to 2036 Total: 2554			

Table 3: Housing Requirement⁴	
Dwelling Requirement (figure derived from growth scenario)	9,570
Total Housing Provision	10,530
Total Housing Supply	5,850
Residual Balance (Remainder to be found on new sites)	4,675

⁴ Figures in Table 3 are subject to rounding

PS2 Delivery Strategy

Urban Area

New development will predominately occur within, and adjoining, the Newport urban boundary. The urban area of Newport forms the highest tier of the settlement hierarchy and the most sustainable location for growth.

Proposals within the urban area will be considered most favourably, particularly where they contribute to:

- i) the vitality, viability and quality of the environment of the city centre;
- ii) the provision of residential and business opportunities within the urban area;
- iii) reuse of vacant, underused or derelict land;
- iv) encourage the development of community uses where appropriate.

Rural Communities

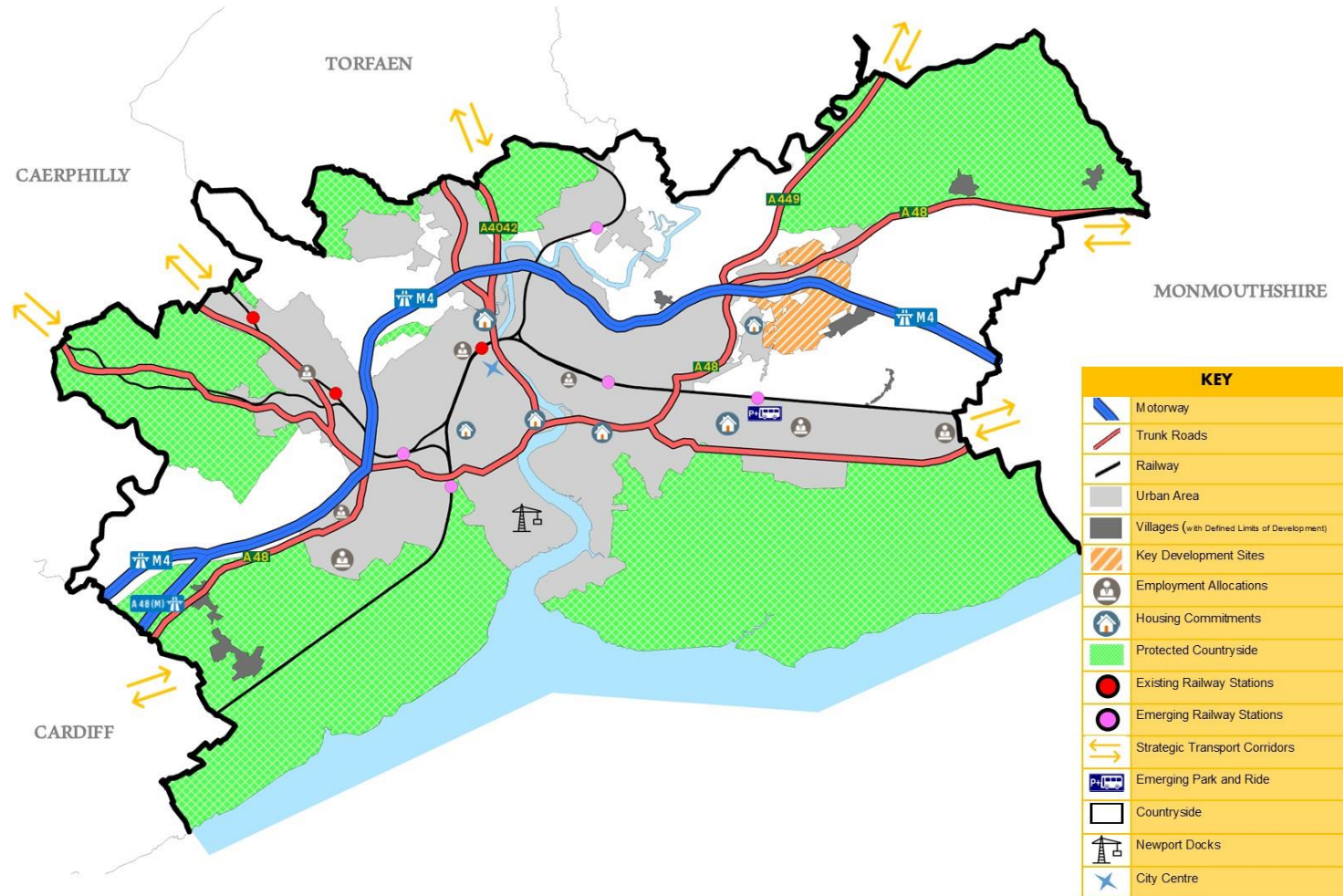
Several villages are defined outside of the urban boundary, these form the second and lowest tier of the settlement hierarchy. These are rural communities which are relatively less constrained and where good access to services and facilities has been assessed, suggesting an appropriate level of self-sufficiency. Development of an appropriate type and scale will be supported within village boundaries, including that which comprises infilling and rounding off. Development adjoining boundaries may be appropriate where local a need can be evidenced.

Defined villages are Bishton, Underwood, Parc Seymour, Christchurch, Castleton and Marshfield.

Countryside

Land outside and disconnected from settlement boundaries is defined as countryside. Development will only be permitted in these locations where there is an evidenced need for such development and where it can be demonstrated that development sufficiently addresses any site specific constraints, including respecting the landscape character and biodiversity of the immediate and surrounding area. Development must also be appropriate in scale and design.

Key Diagram



7 Key Development Sites

7.1 Using the Candidate Site Register as a starting point, an assessment of Key Sites has been undertaken to inform the Preferred Strategy. Key Sites have been defined as housing and employment sites which are likely to be able to make a very good contribution towards placemaking objectives. To partially address the remainder of 4,675 outlined within Table 2, it is proposed that three key sites are taken forward. These are sites which performed best in the Candidate Site assessment and the Candidate Site Assessment Report provides the details of this, including the Council's conclusions regarding other Key Sites. The following sites provide the opportunity to bring forward 2,850 additional dwellings and associated facilities and infrastructure on Key Sites.

7.2 Eastern Expansion Area

7.2.1 In addition to further supporting the delivery of strategic commitments in the Eastern Expansion Area on Glan Llyn and Great Milton Park, a continuation of growth in this location is proposed on a new strategic allocation for a new community comprising up to 2,500 new homes, Green Infrastructure, a local centre and other complementary uses. Of the 2,500, 1,800 homes are anticipated as being delivered up to 2036. The following development framework brings together the Council's understanding of the site and will inform development masterplanning to support the drafting of an allocation to be included in the Deposit Plan.

KS4: Langstone Road, Llanwern, Ref CS0032

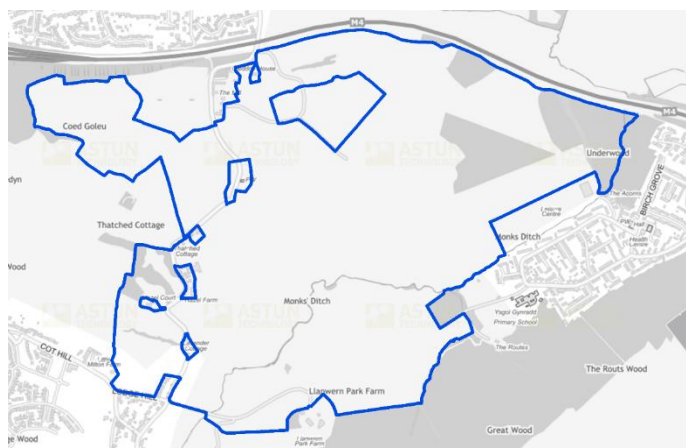
Land east and west of Langstone Road, Llanwern is identified for mixed use development for up to 2,500 homes, a district centre, public open space and a network of Green Infrastructure.

Development Framework

The masterplanning approach taken to bring the site forward will address the following constraints, placemaking principles and infrastructure requirements addressed:

Constraints:

The following constraints will need to be addressed:



- Detailed survey work to understand the presence of Best and Most Versatile Agricultural Land on site with appropriate solutions incorporated into site layout and design.
- Where Tree Protection Orders and Ancient Woodland are apparent on site, they must be protected from development.
- Areas subject to flood risks in the south of the site are to be excluded from any developable areas and safety of future residents is a key consideration for any mitigation strategy, which will be informed by a Flood Consequence Assessment.
- Avoidance of any impacts of ecological habitats and networks with the site being a likely habitat for bats and dormice, among other species. Appropriate measures are to be informed by detailed ecological surveys, including a Bat Survey, and these will inform any strategy to deliver biodiversity net benefit.
- Existing Green Infrastructure Corridors are to be identified and protected.
- All of the onsite Sites of Importance for Nature Conservation are to be excluded from the developable area.
- The southern part of the site falls within the Registered Park of Llanwern, requiring an archaeological desk-based assessment and geological survey at the planning application stage.
- The rural setting of nearby listed buildings and onsite Schedules Ancient Monuments are to be protected through buffers to these sites, informed by a Heritage Impact Assessment.
- A full Noise Assessment is required to support any future planning applications.

Infrastructure Requirements

Draft Preferred Strategy for Cabinet

To ensure that the everyday needs of existing and new communities can be suitably met, development will need incorporate or support:

- i. Up to 2,500 homes comprising a mix of house types and sizes, including the provision of affordable housing in accordance with emerging targets.
- ii. An appropriately located district centre to include small scale retail, local services, schools, health care facilities, community facilities, and co-working spaces.
- iii. Cycle ways and shared use routes are to be incorporated onsite providing excellent levels of access across the site. To include linkages to routes outside of the development area, including those linking the site to the proposed Llanwern Railway Station.
- iv. Introduction of public transport infrastructure to provide connectivity across the site, linking the eastern most points to facilities in the east of Newport and the City Centre.
- v. Provision of new leisure space onsite.
- vi. Create a network of multifunctional Green Infrastructure which increases access to active travel corridors, enhances biodiversity, supports sustainable drainage and provides spaces for well-being benefits.
- vii. The provision of at least one 3 form entry primary school onsite.
- viii. The provision of land and/ or contributions to provide a new secondary school.
- ix. The protection and improvement of existing utilities assets apparent onsite.
- x. Any necessary site specific measures to improve water and sewerage infrastructure, to be informed by a Hydraulic Modelling Assessment.
- xi. The protection of Public Rights of Way and retention of green corridors. Enhancements to Public Rights of Way, where necessary.
- xii. Incorporation of roof mounted solar and low carbon building measures onto all buildings.
- xiii. Appropriate transport infrastructure is to be delivered onsite, including suitable access arrangements. Measures are to be informed by a full and comprehensive Transport Assessment, for which the scope will need to be agreed with NCC Highways. Necessary works are likely to include those to increase junction capacity associated with access points and pedestrian improvements at Langstone Court Road.
- xiv. Onsite measures to control and influence movements through the site, such as bus gates, will be informed by transport modelling.

Placemaking Principles

To support the creation and enhancement of healthy, sustainable communities. Development must accord with the following principles:

- a) A mix of house types and sizes to be developed at an appropriate density.
- b) The provision of affordable housing in accordance with emerging targets, affordable housing comprising a suitable mix of types and tenures to meet local needs and to be delivered throughout the development.
- c) The incorporation of specialist accommodation to address local needs, e.g. housing for older people and self-build housing.
- d) Habitat connectivity and resilience across the site and within the wider landscape, including the retention of woodland north of the open Gwent Levels SSSIs is important for wider biodiversity and to support ecological corridors for wildlife that will be even more important as wildlife responds to climate change.
- e) Appropriate buffers to and measures to ensure the amenity of future residents from any noise, dust, odour and light impacts arising from the M4 to the north or any relevant vectors onsite.
- f) A strategy to encourage modal shift among future residents and users of the site, including cycle storage incorporated into the design of each dwelling and across the site.
- g) The incorporation of satisfactory air quality measures for mitigating and/or reducing emissions from all sources associated with them, this includes routing traffic away from Air Quality Management Areas during construction and designing operational phases in a way that addresses air quality matters and the unintended consequences such as the exacerbation of traffic congestion are minimised.
- h) Building to zero carbon ready standards, including the use of alternative sources of heating and cooking to gas supply and incorporating energy efficiency considerations into the overall site layout and design.
- i) Access to existing and new onsite facilities will be informed by the principles of the 20-minute neighbourhood and based upon a design ethos of creating complete, compact and connected neighbourhoods where people can meet their everyday needs within a short walk or cycle.

7.3 Langstone Growth Area

7.3.1 Land is proposed to be allocated across two sites at Langstone, supporting an overarching placemaking strategy to achieve a local objective of enhancing access local services and facilities by supporting new ones as a part of development and enhancing active travel networks to enable easier movements to the core of Newport. Each proposed allocation sets out a broad framework for how this objective will be achieved through new development. The following development frameworks bring together the Council's understanding of the sites and will inform development masterplanning to supporting the drafting of an allocation to be included in the Deposit Plan.

KS7: North Langstone, Ref CS0014, CS0053, CS0065

Land north of Langstone is identified for residential development for up to 750 homes and a local centre.

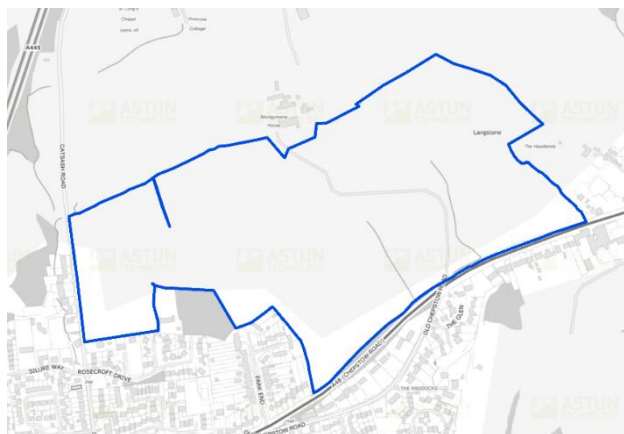
Development Framework

A masterplanning approach will be taken to bring the site forward with the following constraints, placemaking principles and infrastructure requirements addressed:

Constraints:

The following constraints will be addressed:

- Detailed survey work to understand the presence of Best and Most Versatile Agricultural Land on site with appropriate solutions incorporated into site layout and design.
- Potential landscape impacts arising due to presence of Wentwood Special Landscape Area to the north and potential encroachment into countryside. Lower densities to the north of the site may be appropriate.
- A full appraisal of the potential impacts on Langstone – Llanmartin Meadow Site of Special Scientific Interest.
- Full up-to-date ecological surveying to inform species conservation and any compensations for habitat loss. Onsite habitats are likely to include bats, dormice, reptiles and birds. These will inform any strategy to deliver biodiversity net benefit.
- A desk based archaeological assessment is required for the whole of the site and further archaeological investigations are required for the southern parcel of the site to inform appropriate mitigation.
- A full Noise Assessment is required at the planning application stage.



Infrastructure Requirements

To ensure that the everyday needs of existing and new communities can be suitably met, development will need incorporate or support:

- i. Up to 750 homes comprising a mix of house types and sizes, including the provision of including the provision of affordable housing in accordance with emerging targets.
- ii. New local retail and commercial uses of an appropriate type and size to address neighbourhood needs, which are accessible from all parts of the development site and by the existing community through walking, cycling and public transport.
- iii. Educational facilities to address needs arising from new development through the expansion of existing or provision of new facilities in the Langstone area. Including the provision of land onsite, where required.
- iv. The protection of Public Rights of Way and retention of green corridors. Enhancements to Public Rights of Way, where necessary.
- v. Provision of new leisure space onsite.
- vi. The protection and improvement of existing utilities assets apparent onsite.
- vii. Any necessary site specific measures to improve water and sewerage infrastructure, to be informed by a Hydraulic Modelling Assessment.
- viii. Cycle ways and shared use routes are to be incorporated onsite. Consideration is to be given to links to routes outside of the development area, particularly Chepstow Road.
- ix. Measures to reduce impacts on road, safety, operation or capacity of the highway network to be informed by a Transport Assessment.

Draft Preferred Strategy for Cabinet

- Delbury Grasslands SINC is apparent within the south of the site and is to be retained as open space.
- Langstone – Llanmartin Meadows Site of Special Scientific Interest is apparent onsite to the south. Further assessment is required to fully understand potential impacts and inform measures to ensure that the proposal would not damage the notified features of the SSSI alone or in combination with the other candidate sites. This includes to ensure appropriate buffers are incorporated in establishing the developable area and the degradation of habitat through hydrological links is suitably avoided.
- Detailed ecological survey work will be able to inform any strategy to deliver biodiversity net benefit.
- Detailed survey work to understand the presence of Best and Most Versatile Agricultural Land on site with appropriate solutions incorporated into site layout and design.
- Land to the east adjoins Scheduled Monument of Ford Farm Roman Villa MM298, further reducing potential for built development in this part of the site. The area itself has Roman finds and the description notes that archaeological features are likely to exist outside the boundary of the Scheduled area. Further investigation of potential impacts arising from any works proposed on the eastern parcel are likely to be needed. Archaeological investigations are required for the whole of the site prior to development to ensure any appropriate archaeological mitigation is incorporated.
- Noise impacts from the M4 and operational machinery to the north are to be addressed through appropriate mitigation, including identifying areas requiring additional sound insulation measures due to elevated traffic noise. A Full Noise Impact Assessment is required to inform site layout.

Infrastructure Requirements

To ensure that the everyday needs of existing and new communities can be suitably met, development will need incorporate or support:

- i. Up to 300 homes comprising a mix of house types and sizes, including the provision of affordable housing in accordance with emerging targets.
- ii. Educational facilities to address needs arising from new development through the expansion of existing or provision of new facilities in the Langstone area. Including the provision of land onsite, where required.
- i. Provision of new leisure space onsite, including through multi-functional open space.
- ii. Creation and retention of a Green Infrastructure network, which supports resilient habitat corridors and maintains ecological connectivity in the local environment. This network must be sufficiently extended in size to provide for both people and biodiversity as a part of ensuring resilience.
- iii. Maintaining of ecosystem connectivity through the retention of hedgerows and trees.
- iv. The protection and improvement of existing utilities assets apparent onsite.
- v. Any necessary site specific measures to improve water and sewerage infrastructure, to be informed by a Hydraulic Modelling Assessment.
- vi. Measures to reduce impacts on road, safety, operation or capacity of the highway network to be informed by a Transport Assessment.
- vii. Measures to avoid traffic impacts on the Coldra M4 roundabout junction. Appropriate measures will be identified in consultation with SEWTRA and Welsh Government.
- viii. An internal road network built to highways standard and conform with Manual for Streets, this includes a loop road to allow for larger vehicles to navigate the network in forward gear.
- ix. The protection of Public Rights of Way and retention of green corridors. Enhancements to Public Rights of Way, where necessary.
- x. Cycle ways and shared use routes are to be incorporated onsite. Consideration is to be given to links to routes outside of the development area, in particular linking to the canal tow path from Cwm Lane.
- xi. The incorporation of any neighbourhood facilities or specialist housing provision, where required.
- xii. Incorporation of roof mounted solar and low carbon building measures onto all buildings.

Placemaking Principles

To support the creation and enhancement of healthy, sustainable communities. Development must accord with the following principles:

- a) A mix of house types and sizes to be developed at an appropriate density.
- b) The provision of affordable housing in accordance with emerging targets, comprising a suitable mix of types and tenures to meet local needs and to be delivered through the development.
- c) The incorporation of a network of SuDs and Green Infrastructure, including the maintaining of open, natural land to the east of the site to protect designated sites.
- d) Land within the south and east of the site to form buffers with the only work occurring in these areas being for the betterment of existing assets, designations or formalisation of greenspaces, as appropriate.
- e) Integration of appropriate drainage measures into design, with matters relating to Sustainable Drainage Systems (SuDS) being subject to a separate SuDS approval process.

- f) The incorporation of satisfactory air quality measures for mitigating and/or reducing emissions from all sources associated with them, this includes routing traffic away from Air Quality Management Areas during construction and designing operational phases in a way that addresses air quality matters and the unintended consequences such as the exacerbation of traffic congestion are minimised.
- g) A strategy to encourage modal shift among future residents and users of the site, including cycle storage incorporated into the design of each dwelling and across the site.
- h) Building to zero carbon ready standards, including the use of alternative sources of heating and cooking to gas supply and incorporating energy efficiency considerations into the overall site layout and design.

7.3.2 One essential feature to the delivery of KS8 is that no built development is to occur on Candidate Site 0016, including any vehicular access across the site. Instead, parts of this site are to be incorporated into the masterplan, where appropriate, to provide land for mitigation, habitat connectivity and ensure that the impacts of development on designated sites and other constraints are limited. Further detailed assessment of constraints, including input from Natural Resources Wales will inform masterplanning to agree a developable area between all relevant parties.

8 Strategic Framework

8.1.1 The Strategic Framework outlines the strategic policies which support the implementation and delivery of the Preferred Strategy and RLDP as a whole. These seek to respond to objectives to provide policies which will be relevant for the consideration of planning applications made in Newport up to 2036.

PS3 Sustainable Placemaking

PS3 Sustainable Placemaking and Design

All new development proposals will be required to make a positive contribution to sustainable places to support the high-quality design, health and well-being of communities. They will be assessed as to their contribution towards the following:

- i. High quality design, which is inclusive and accessible, meeting the full needs of existing and future communities, while protecting and enhancing the built and natural environment.
- ii. A Green Infrastructure led approach, which is informed by the Council's Green Infrastructure Assessment.
- iii. The efficient use of land, which supports a mix of uses at appropriate densities.
- iv. Meeting a range of housing needs through the appropriate mix of housing types and tenures.
- v. A plot-based approach to design, providing opportunities for small plots, including custom and self-build schemes.
- vi. Supporting active travel within communities by ensuring that streets are safe, comfortable and enjoyable and that developments offer access to public transport and range of facilities within walking distance of most residents.
- vii. Prioritising access and movement by active and sustainable transport across the city, by route and system integration, reducing dependency on private vehicles for short trips.
- viii. Encouraging economic diversification and in particular improving the vitality and viability of the city centre and district centres.
- ix. Supporting and sustaining the long-term growth of the Welsh language.
- x. Avoiding unacceptable harm to health as a result of land contamination, air quality, noise, light or flooding.

8.1.2 Sustainable placemaking and design is essential to delivering sustainable developments. All new developments in Newport are expected to support and achieve positive economic, social, environmental and cultural outcomes, while minimising adverse ones. These outcomes support the strategic placemaking approach outlined by Policy 2 of Future Wales and contribute to the national sustainable placemaking outcomes set out within Planning Policy Wales.

8.1.3 Newport City Council is a signatory of the Placemaking Charter. Policy PS3 seeks to deliver on the pledges of this charter. Policy PS3 is to be underpinned by a number of topic based policies in assessing these criterion. Each of the matters outlined by PS3 should be considered at the earliest stages of design.

8.1.4 Good design is integral to ensuring places can address the needs of current and future residents, this includes the protection and betterment of natural spaces for the enjoyment of communities. Newport has a rich historic built environment and local character and identity, which forms an essential part Newport's sense of place. Supporting this through design is important. Further, the consideration of a range of access needs should inform proposals, meaning that the end user is in mind at the earliest stages.

8.1.5 Securing a Green Infrastructure led approach to design is essential to ensuring that a existing and new network are enhanced and created to support development. Green Infrastructure also contributes the public realm and public open space, where appropriate. This is outlined in more detail in Policy PS15.

- 8.1.6 Developments should make the most efficient use of land, including the identification of a range of uses, identifying developable and undevelopable areas, and bringing forward appropriate densities. Future Wales outlines 50 dwellings per hectare as an ideal density. There may be some circumstances where this isn't appropriate and densities which fall below this should be outlined and clearly justified through schemes taking account of local circumstances. Proposals within the urban core should be seeking to achieve densities of 50 dwellings per hectare, in line with Future Wales.
- 8.1.7 Housing developments will need to support a variety of housing tenures and types to address a range of needs and contribute towards local affordable housing targets. Further, a plot-based approach has the potential to support a different types of house builders and create opportunities for self and custom build housing. Opportunities for these will need to be explored on Key and Large Sites.
- 8.1.8 Providing a mix of uses on site can have benefits of reducing the need to travel and subsequently the need to travel by car. Supporting active travel onsite will be essential to ensure modal shift, as well as connecting linkages which may exist on the periphery of development sites promoting overall access and connectivity. This includes ensuring sufficient access to existing and new walking, cycling, bus and train networks.
- 8.1.9 The vitality and viability of the City Centre, is an essential part of delivering better placemaking. Directing appropriate development towards the City Centre and District Centres is essential to ensuring services and facilities are available in these accessible locations. Commercial land uses will be promoted within these areas and the diversification of commercial land uses will be promoted in line with Policy PS9, which sets out the retail and commercial strategy.
- 8.1.10 Growing the Welsh language is a national ambition for Wales. Use of the Welsh language is growing within Newport and the design of places can support opportunities for people to engage with the Welsh language, while social infrastructure may provide learning opportunities. Developments will need to avoid impacts on access to the Welsh language.
- 8.1.11 All development will need to ensure that no unacceptable impacts on public and environmental health occur as a result of development during both construction and operational stages.

PS4 Climate Change

PS4 Climate Change

All development proposals must make a positive contribution towards mitigating, adapting and building resilience to the impacts of climate change. Proposals must take account of the need to:

- i. avoid development in areas assessed as being at risk of flooding and, where these locations cannot be avoided, development is to be designed in a way which minimises risks and ensures flood resilient design;
- ii. achieve low / zero carbon building development, including designing buildings in a way which minimises energy consumption and incorporates renewable, low or zero carbon energy sources, including on site energy provision;
- iii. incorporate local heat networks and low carbon heating, such as heat pumps;
- iv. adopt sustainable construction practices, including reuse or recycling of existing construction materials present on the site or using local materials;
- v. improve sustainable access through spatial design, digital connectivity and maximised sustainable travel and transport opportunities;
- vi. integrate electric vehicle charging infrastructure and Zero Emission Vehicle infrastructure onsite;
- vii. maximise Green Infrastructure opportunities as a part of nature-based solutions as a part of increasing on site resilience;
- viii. minimise, re-use and recycle waste; and
- ix. ensuring the sustainable and efficient use of energy and resources such as land, water and minerals.

8.1.12 Newport City Council declared a Climate and Ecological Emergency in November 2021. Following this the Council has developed the Climate Change Plan 2022-2027 and Local Area Energy Plan 2022. These two strategies are key documents which set out local targets, including a target for the city of Newport to be net zero by 2050 in line with the national target and for Newport City Council to achieve net zero by 2030.

8.1.13 Policy PS4 seeks to align with the Climate Change Action Plan to ensure that development in the city aligns with the targets set out within the strategy. The measures set out broadly align with goals relating to transport, flood risk, low carbon building, renewable energy and nature-based solutions. Detail relating to how these can be addressed through proposals is set out through detailed policies and key site allocations.

8.1.14 Welsh Government declared a climate emergency in 2019. As such, the latest changes to national policy and guidance reflect a priority for reducing the causes through mitigation, reducing the impacts through adaptation to and resilience against climate effects.

8.1.15 Flood risk is a concern for Newport due to its coastal context and location on the River Usk. This is something which is directly addressed by PS15. Flood risk has an integral relationship with Climate Change.

8.1.16 General resource efficiency of energy, heat and water is an essential element of good design. Minimising resource demand through new development has huge benefits, including assisting meeting UK targets to tackle climate change, reducing the need to retrofit new homes, reducing pressure on local resources such as water resources, and reducing long term running costs to individual householders. Detailed guidance referring to standards and design advice on how to achieve energy efficiency in buildings and developments is set out within the development management policies of the Plan.

- 8.1.17 Nature based solutions are considered a necessary approach in building resilience within new developments and existing communities where climate effects could be exacerbated as a result of new development. Green roofs and green walls are a design measure that can provide social and economic benefits as they: help to soften the urban environs; mitigate for the urban heat island effect; filter airborne and gaseous pollutants; help to absorb noise pollution; provide a public amenity / green space; and are aesthetically pleasing. Green roofs and walls also benefit the sustainability of the building itself by helping to regulate internal building temperatures and recycle rainwater. They can contribute to more innovative design scheme. They also contribute to green infrastructure more generally, which will help our environment adapt to the impacts of climate change and respond to the ecological emergency, as well as helping to mitigate the causes. In addition, green walls and roofs can also provide opportunities for biodiversity in buildings and provide a valuable part of a wider net gain.
- 8.1.18 To ensure that finite resources are being used in a sustainable manner, developments should where possible use secondary and recycled aggregates as part of the construction process. Wherever possible this should be done without taking materials off site. The sustainable management of minerals and waste is covered in more detail by minerals and waste policies.

PS5 Health and Well-being

PS5 Health and Well-being

All development proposals should seek to maximise their positive contribution to health and well-being of existing and new communities, including the reduction of health inequalities. Negative impacts should be avoided by ensuring development is located in the most sustainable locations and supports:

- Community assets and cohesion to support well-being
- Transport and active travel
- Lifetime Homes Standards

- 8.1.19 In line with the Well-being Duty to bring forward sustainable development as set out by Well-Being of Future Generations Act 2015, spatial strategy and good placemaking, locating development in more sustainable locations forms a key part of promoting health and well-being and reducing health inequalities. For example, it is reasonable to assume that where developments are located in locations that are only accessible by the car, the likelihood of people walking to destinations is greatly decreased. This is therefore likely to lead to more inactivity in the local population.
- 8.1.20 Policy PS5 outlines three broad determinants of health, which align with the Well-being of Future Generations Act 2015 and the Marmot principles. Each can be broken down into specific measures and development proposals should seek to address each of these by positively supporting these determinants through their location or enhancements as a result of development.
- 8.1.21 Community assets and cohesion to support well-being, could include: access to existing, new or improved green and blue spaces; incorporating food-growing potential; provision or enhancement of local services and facilities that can support well-being; with all of these being easily accessible through walking and cycling routes.
- 8.1.22 Active travel is to be supported through improved opportunities and new and improved active travel infrastructure, such as well-connected transport hubs, walking and cycling routes and storage infrastructure, to enable a behaviour change towards active transport.
- 8.1.23 Lifetime Home Standards are to be incorporated into residential developments to support a built environment where housing can reflect and adapt to the needs of people throughout their lives. All development proposals should consider the accessibility needs of the end-user in line with PS1.

- 8.1.24 In some cases, it may be appropriate for large major developments to be accompanied by a Health Impact Assessment and these may be necessary for proposals where a health impact is considered to be apparent.

PS6 Infrastructure

PS6 Infrastructure

To support healthy and sustainable communities, all development will need to be supported by sufficient existing or new infrastructure through provision or financial contributions towards such infrastructure, where necessary. This list is not exhaustive, but the following are infrastructure priorities that developments will be expected to provide or contribute to in order to mitigate any negative consequences of development:

- educational facilities and/or their upgrades;
- affordable housing;
- improvements to the highway network, including walking and cycling routes and public transport;
- outdoor recreation;
- protection, enhancement and management of the natural, historic and built environments;
- community facilities and/or their upgrades; and
- improvements to the public realm.

- 8.1.25 In order to mitigate the impact of development, infrastructure requirements will be secured through planning agreements and obligations. The Planning Obligations SPG will continue to provide the framework and requirements for planning obligations for new developments. The Council will negotiate planning obligations on a site-by-site basis where these are necessary to make the development acceptable in planning terms. Obligations will be directly related to the development and fairly and reasonably related in scale and kind to the development.

- 8.1.26 Balancing infrastructure needs along with viability is a key concern for the plan to address and addressing placemaking priorities through allocated sites is essential to ensuring development proposals avoid impacts and contribute towards the achievement of these objectives.

PS7 Affordable Housing

PS7 Affordable Housing

To address affordable housing needs in the City, new housing developments will incorporate or contribute to affordable housing provision, supporting a mix of housing types and tenures to be delivered on or, if necessary, off-site.

Affordable homes should be dispersed throughout development.

- 8.1.27 A Local Housing Market Assessment (LHMA) is being prepared by Newport City Council. Early stages of this process have indicated a need to maximise the delivery of affordable housing tenures across Newport, specifically the social rent stock. An overarching policy position will seek to emphasise the delivery of affordable housing as a priority and policy targets will be informed by the LHMA as it develops ahead of submission to Welsh Government in 2024. The overarching policy position set out in PS7 will be supplemented by the review of development management policies.

- 8.1.28 Providing affordable housing is a priority for Newport and all new housing developments will be expected to contribute to addressing affordable housing needs.

8.1.29 Development viability is a key aspect of securing affordable housing through new developments. Viability will be considered carefully and policy targets, including those relating to individual site viability will be carefully considered taking into account identified needs and financial viability.

PS8 Employment Land

PS8 Employment Land Provision

87.5ha of employment land is allocated to address the requirement for 77ha of employment land, the following sites are allocated as employment land:

- i) Celtic Lakes – 38.5 hectares for B1, B2, and B8 uses;
- ii) Celtic Springs – 3 hectares primarily for B1 use;
- iii) Gwent Europark – 16 hectares for B8 distribution uses;
- iv) Land Off Chartist Drive, Rogerstone – 2 hectares for B1, B2 and B8 uses;
- v) Celtic Business Park (St Modwen Park) – 25.9 hectares for B1, B2 and B8 uses;
- vi) Godfrey Road (Rear of Station) – 2 hectares for B1 and other commercial uses;

these allocations will be protected for employment uses, and alternative uses for the sites will be resisted.

8.1.30 The Plan makes provision for 87.5ha of employment land across a range of sites. These allocations have been informed by the Employment Land Review 2022 and further analysis of existing commitments is detailed within the Employment Land Background Paper. These allocations will be supplemented by a number of detailed policies outlining planning considerations for each of these sites, as well as policies protecting the existing employment land stock, supporting the redevelopment of Newport Docks. Detailed policies will also consider the role of the rural and foundational economies.

8.1.31 The growth strategy outlines a need to provide 8,640 new jobs to provide new economic opportunities for existing and new communities in the City. New jobs will be provided through the delivery of B Class uses on allocated employment sites and through other sectors of the economy, including through the foundational economy. Enhancing employment opportunities through new B Class land uses is likely to be able to support other objectives of enhancing self-containment. The reuse and redevelopment of existing employment land will have a key role in maintaining the City's commercial offer over the long term and in supporting growth in economic cluster sectors, such as the semi-conductor industry.

PS9 Retail and Commercial Centres

PS9 Retail and Commercial Centres

Proposals for new retail, commercial, leisure, higher education, health and public service facilities are best located in a city centre and where proposals are not in the City Centre, they will be subject to an assessment of need and the sequential test.

Development will be preferentially located according to the following hierarchy of centres:

- 1. Newport City Centre
- 2. District Centres
- 3. Local centres
- 4. Out of centre sites

8.1.32 National Planning Policy sets out a need for Local Planning Authorities to take a hierarchical approach to the consideration of proposals for retail, leisure and other uses complementary to retail and commercial centres.

- 8.1.33 Newport City Centre has faced a number of challenges since the adoption of the 2011-2026 Local Development Plan. Changing shopping habits, which have been accelerated by the Covid-19 pandemic, have limited investment opportunities for the City Centre to reduce vacancies and improve the overall offer of Newport City Centre. Ongoing impacts of the Covid-19 pandemic and changing market demands continue to influence the changing role and function of the city centre.
- 8.1.34 Despite this, the City Centre has experienced some good successes through the Friars Walk development, the refurbishment of Newport Indoor Market and the opening of the first 4* City Centre hotel. These have changed the way in which visitors use the City Centre.
- 8.1.35 Policy PS9 indicates that Newport City Centre is the principal location for retail and complementary uses. The City Centre does face competition from lower order district centres and retail parks. Competition is predominately with Newport Retail Park. The sequential test will be applied to all proposals for retail and complementary uses outside of the City Centre, as defined by the Proposals Map. This approach will be taken to support the vitality and viability of the City Centre through a mix of uses. Where retail and commercial proposals are not within a defined centre, an assessment of need is required. Assessments should be proportionate to proposals.
- 8.1.36 There may be cases, where uses are more suited to district centres in line with development management policies. As such, it may be necessary to consider whether district centre proposals are most suitably located in the City Centre when considering the requirement to demonstrate need and satisfying the sequential test.
- 8.1.37 In line with national policy, Retail Impact Assessments will be required where proposals fall on the edge, or outside, of defined centres and comprise 2,500sqm floorspace or more. There may be some circumstances where smaller proposals on the edge, or outside of centres, will be subject to a Retail Impact Assessment to assess impacts on defined centres.
- 8.1.38 Application of the assessment of need, the application of the sequential test and Retail Impact Assessment, will consider the nature and site of the activity proposed. Development should be of a scale appropriate to the retail centre within which they are located, and should contribute to or sustain the vitality and attractiveness of that retail centre within the hierarchy.
- 8.1.39 Supporting the vitality and viability of the City Centre is important for ensuring that Newport's communities can access necessary facilities. The City Centre benefits from very good public transport connectivity, which enables the City Centre to be accessible to a large number of people. The City Centre Masterplan and a City Centre placemaking plan will support the delivery of Policy PS9 and opportunities to explore new uses which could promote activity and the objectives of the Council led strategies will be encouraged through decision making.

PS10 Sustainable Transport

PS10 Sustainable Transport

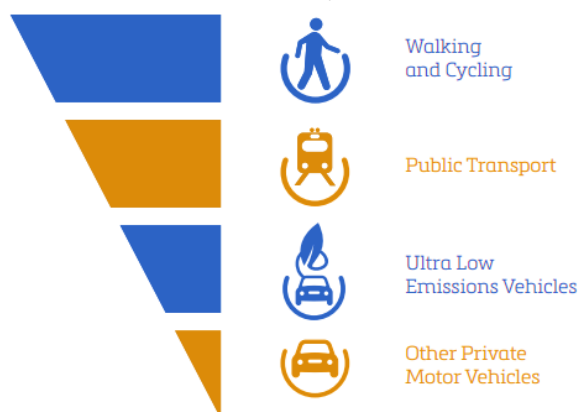
Development must seek to be sustainable transport oriented and accord with the Sustainable Transport Hierarchy by being located and designed in a way which reduces the need to travel, promotes sustainable access to a range of services and facilities, including employment, and reduce dependency on the private car. Development will need to be supported by appropriate transport measures and infrastructure and proposals will need to:

- i. be well located to reduce the need to travel to employment and other services and facilities;
- ii. prioritise walking and cycling through the safeguarding, improvement and expansion of the existing active travel network;
- iii. ensure that street design balances network efficiency with safe and comfortable access for all users;
- iv. promote accessibility to and from new development through sustainable modes of transport;
- v. enhance public transport opportunities, such as bus priority, safeguarding and enhancement of rail routes and identification of new railway stations;
- vi. prioritise transport measures and schemes in line with regional and local transport plans;
- vii. Consider the designation of transport interchanges for park and ride, park and share, and road to rail freight centres;
- viii. provide an appropriate level of parking provision for a range of parking needs, including charging infrastructure for Zero Emission Vehicles.
- ix. utilise green infrastructure for its well being and air quality benefits in place shaping;
- x. integrate with digital monitoring and systems for traffic and air quality management.

Transport Assessments, including Sustainable Travel Plans / Transport Implementation Strategies will be required in accordance with Technical Advice Note 18: Transport.

8.1.40 Decisions will be made in the context of the Sustainable Transport Hierarchy. In line with the hierarchy, development should seek to reduce the need to travel, promote active travel, support public transport and Zero Emission Vehicle infrastructure, ahead of the private car.

Sustainable Transport Hierarchy



8.1.41 Taking this approach will support the transition away from private car usage towards sustainable modes of transport and promote an integrates approach to transport and land use planning through development proposals. The policy seeks to reflect and align with the objectives of the Newport Local Transport Plan 2015 relating to safety and security, connectivity and accessibility, quality and efficiency, environment and land use and regeneration.

8.1.42 Llwybr Newydd: the Wales transport strategy 2021 prioritises bringing services to people to reduce the need to travel; enable easy

movement of people and goods through accessible, sustainable and efficient transport services and infrastructure; and encouraging people to transition towards using sustainable transport. Llwybr Newydd sets out the national framework for future regional and joint local transport plans to come forward.

- 8.1.43 Newport occupies a strategic location in the region, where the delivery of sustainable transport and transport integration should be considered in the wider context and Llwybr Newydd outlines overcoming congestion on the M4 as a key issue in South East Wales. Development proposals will need to support solutions to this issue and avoid worsening existing issues through incorporating a sustainable transport strategy in line with national priorities, as well as regional and local transport plans which build upon these priorities.
- 8.1.44 The themes of Newport City Councils Sustainable Travel Strategy have been reflected within the updated Air Quality Action Plan for Newport. This identifies how the air quality areas of emissions from transportation and new development can be mitigated in order to bring its Air Quality Management Areas (AQMAs) into sustained compliance with the air quality objective for nitrogen dioxide emissions where this has been breached historically.
- 8.1.45 A design process for transportation and new development that front loads local air quality and climate change in its delivery of positive environmental and community outcomes is essential.
- 8.1.46 Suggested thresholds set out within Annex D of Technical Advice Note 18: Transport (TAN 18) will be applied when requiring a Transport Assessment (TA), however there may be some circumstances where proposed development is in a location where the network is particularly sensitive will need to be accompanied by a TA to establish anticipated impacts of development. These provide an important basis for the preparation of Transport Implementation Strategies and Sustainable Travel Plans, which set out measures for more sustainable travel patterns. In accordance with TAN 18, Transport Assessments should incorporate Transport Implementation Strategies. In some cases, proposals falling under the thresholds for TAs set out by TAN 18 will need to be supported by a Sustainable Travel Plan as part of the planning application process. Both Transport Assessments and Sustainable Travel Plans should be proportionate to the scale and nature of proposals and any identified local transport issues.

PS11 Transport Proposals

PS11 Transport Proposals

Transport proposals should seek to align with the Sustainable Transport Hierarchy and will be supported where they:

- i. provide infrastructure to support walking and cycling and expansion of the existing active travel network;
- ii. provide new and enhanced local and regional connections by public transport
- iii. support transition towards Zero Emission Vehicles;
- iv. improve road safety and reduce congestion, particularly on the m4 and strategic road networks;
- v. provide access to new development areas through sustainable transport modes;
- vi. will demonstrably result in other environmental improvements, including air quality, noise reduction, sustainable drainage and enhanced biodiversity.

- 8.1.47 Transport schemes will be supported where they result in benefits to the environment, economy, health and well-being of the community. The provision of choice of transport modes is important in achieving sustainable development, as is the integration of modes of transportation. Encouraging walking and cycling through the improvement of infrastructure and accessibility will not only have environmental benefits but also promote healthier lifestyles, contributing toward placemaking, health and well-being objectives.
- 8.1.48 As transport is a contributor to atmospheric pollution, it is therefore essential that the use of more energy efficient modes of transport is encouraged in line with the Sustainable Transport Hierarchy and go beyond this to support the transition towards zero emission vehicles, where possible. Improvements to public transport will assist in reducing traffic congestion and in hand, improve air quality and road safety.

- 8.1.49 Proposals for new road infrastructure will be required to integrate the Sustainable Transport Hierarchy and opportunities to enhance access to more sustainable modes of transport, as appropriate. New development should fully consider active and public transport infrastructure options to support shorter and longer journeys ahead of new strategic roads.
- 8.1.50 Proposals associated with delivering a South East Wales Metro network will be supported, including improvements to the corridors stretching out of the City to increase connectivity across boundaries. Specific improvements are those linked to enhancing the Newport/Cardiff A48 corridor through public transport and active travel and reinstatement of passenger services on the Caerphilly/Machen/Newport railway line. More broadly, it is anticipated that associated proposals will include those to enhance strategic bus and active travel corridors and upgrades to the existing rail network, providing improved accessibility by modes other than private car across the City and beyond.
- 8.1.51 Development Management policies will be informed by further investigations and address opportunities for the enhancement linkages between Maesglas and Coedkernew.

PS12 Flood Risk

PS12 Flood Risk

Newport's coastal and riverside location necessitates that development be directed away from flood risk areas and must avoid increasing the risk of flood elsewhere. Development proposals will be considered on the basis of accordance with national guidance. Where appropriate, a detailed technical assessment will be required to ensure that the development is designed to cope with the threat and consequences of flooding over its lifetime. Nature-based solutions to manage flood risk should be prioritised.

- 8.1.52 Flood risk is a key challenge for Newport due to its coastal proximity, its location on the River Usk and the complex reën systems on the Gwent Levels. The tidal limit of the Usk extends beyond Newport's boundary making tidal and fluvial flood risk an issue for a high proportion of the Authority area. In addition to tidal and fluvial flood risk developers must also consider their effect on surface, groundwater and flood risk from artificial sources, including reservoirs and canals. Watercourses within the Internal Drainage Board (IDB) area must not be culverted and development must avoid obstructing the water course by providing a buffer zone of 12.5m minimum for reëns and 7m minimum for field ditches in order to allow on-going maintenance. It is recommended that developers seek advice and information from Natural Resources Wales, the Local Authority and Internal Drainage Board where relevant. There is a clear requirement for developers to address the issue of flood risk and flood resilience in developments in line with TAN 15: Development and Flood Risk (2004) and the emerging update to this document TAN 15: Development, Flood Risk and Coastal Erosion. Principally development will be directed away from flood risk areas, however there may be some circumstances where flood risks are apparent or where flood risks may change over time as a result of mapping which takes account of climate changes, as the Flood Map for Planning does.

- 8.1.53 Developments will need to incorporate appropriate sustainable drainage systems which comply with national standards, these are subject to approval by the Council's Sustainable Drainage Approval Body (SAB) and the layout and design of these will influence the wider layout and design of development sites. As such, it is encouraged that in cases where SAB approval is required, it is sought in concurrence with planning approval. SAB is required for developments of more than 1 home or any development where the construction area comprises 100m² or more. Development proposals may not only be at risk of flooding themselves, but may also exacerbate existing or create new flooding problems on other land or property through reductions in floodplain storage capacity or by impeding flood flows. Developers must ensure that flood flows and storage areas are not compromised. The impact of climate change and sea level rise will require continued and improved flood risk management schemes. Developments must reflect a lifetime appropriate standard of design. In the case of residential development 100 years is required and 75 years for employment, commercial and industrial development.
- 8.1.54 New developments may result in a substantial increase in surface water run-off as permeable surfaces are replaced by impermeable surfaces such as roofs and paving. As well as a consequent reduction in groundwater infiltration this can also result in risks of flooding downstream. Other consequential effects include increased pollution, silt deposition, damage to watercourse habitat and river channel instability. Developments will therefore only be permitted where the Council is satisfied that suitable mitigation measures and provision for the long term maintenance of these measures are included as an integral part of the development. All alleviation works must be detailed as part of the planning application.

PS13 Green Wedges

PS13 Green Wedges

Green wedges have been identified in order to prevent coalescence between the following settlements:

- i) Newport and Cardiff;
- ii) Rogerstone and Risca;
- iii) Bettws, Malpas and Cwmbran;
- iv) Caerleon And Cwmbran.

Within these areas development which prejudices the open nature of the land will not be permitted.

An increase in size of a dwelling of more than 30% of the volume of the original size of the dwelling, or as existed in 1948, will not be approved.

- 8.1.55 Green Wedges have been designated on a common basis with the other local planning authorities in South Wales. The prime purpose of Green Wedges is to prevent coalescence between urban areas. The designation is not necessarily made on the basis of the physical quality of the landscape, but rather to maintain openness. The areas designated tend to have significant importance for their openness and for their role in maintaining the distinct identify of separate communities. Policy PS13 proposes the retention of the current designations and their boundaries, however the emergence of further technical work regarding the Green Belt and Green Wedges, including a Green Wedge Assessment, may result in amendments to these.
- 8.1.56 Planning Policy Wales sets out what is considered inappropriate development within green wedge allocations, and should be referred to for guidance.
- 8.1.57 Any application to increase the size of a dwelling by more than 30% is likely to have a negative impact on the openness of the green wedge and will not be approved.

Green Belt Area for Consideration

8.1.58 In line with Policy 34 of Future Wales, the Replacement Local Development Plan seeks to avoid directing new development towards the area under consideration as Green Belt. The 2011-2026 LDP designated a Green Belt, the purposes of the Green Belt are:

- prevent the coalescence of large towns and cities with other settlements;
- manage urban form through controlled expansion of urban areas;
- assist in safeguarding the countryside from encroachment;
- protect the setting of an urban area; and
- assist in urban regeneration by encouraging the recycling of derelict and other urban land.

8.1.59 These purposes, set out within Planning Policy Wales ed 11, are intended to support a designation that is sustained beyond plan periods to ensure permanence, fulfilling the long term containment of urban areas. The Green Belt designation in Newport has the role of maintaining separation from the built form of Cardiff. Nonetheless, the introduction of a regional Green Belt renders the allocation of a Green Belt by the RLDP inappropriate. There is no certainty that area designated as Green Belt within the 2011-2026 LDP will form part of the regionally defined Green Belt when formally designated by the Strategic Development Plan. As such, maintaining the local principles of the existing Green Belt designation will be addressed through Green Wedge policy at the very least within the Deposit Replacement Local Development Plan and boundaries to these will be informed by the evidence base.

PS14 Special Landscape Areas

PS14 Special Landscape Areas

Special landscape areas are designated as follows within which proposals will be required to contribute positively to the area through high quality design, materials and management schemes that demonstrate a clear appreciation of the area's special features:

- i) North Of Bettws
- ii) West Of Rhiwderin
- iii) Wentlooge Levels
- iv) River Usk
- v) Caldicot Levels
- vi) Wentwood

8.1.60 Within Special Landscape Areas, priority will be given to landscape conservation and enhancement. The designation of a Special Landscape Area does not preclude development but any proposals must demonstrate that they have been designed to respect the valued characteristics of the recognised landscape as well as being in accordance with other Policies of the Development Plan. Further technical work to review SLA designations will inform any changes to the boundaries for these ahead of the publication of the Deposit Plan.

8.1.61 Developers will be required to ensure that proposals do not impact or affect the intrinsic character, quality, feature or conservation value of the Special Landscape Area. Designs will be required to be of a high standard, appropriate in scale and massing, integrated sympathetically into the landscape as well as ensuring long term management. Supplementary Planning Guidance will provide detail concerning the value, management and maintenance of the areas.

PS15 Green Infrastructure and Biodiversity

PS15 Green Infrastructure and Biodiversity

Development will protect and enhance Newport's green infrastructure and biodiversity assets to ensure the integrity and connectivity of this multi-functional resource is maintained and strengthened and positively managed.

Green infrastructure is key to Newport's character, distinctiveness and sense of place, and can include:

- Parks, playing fields, green play areas and open spaces
- Trees (including street trees), woodlands, hedgerows, soils and landscaping
- Strategic recreational routes, cycleways, active travel and the public rights of way network
- Sustainable drainage systems
- Growing spaces including allotments, community orchards and larger public and private gardens
- Undeveloped countryside and coastline
- Landscape, geological and heritage features which contribute to the City's setting
- Strategically important river valleys of the Usk and the Ebbw
- Biodiversity interests including designated sites and the connectivity of priority habitats and species
- Roadside verges, roundabout islands and screen planting along roads.

Protection and conservation of green infrastructure needs to be reconciled with the benefits of development. Proposed development should therefore demonstrate how green infrastructure has been considered and integrated into a placemaking approach; that there is a Net Benefits for Biodiversity; and how the resilience of ecosystems can be maintained. If development results in loss of diversity, extent, connectivity and condition of green infrastructure, appropriate compensation will be required.

Potential conflicts between different elements of green infrastructure should be reconciled as part of any development, and where appropriate, a Green Infrastructure Statement should set out how the layout and design of the scheme will contribute to, or be compatible with, any published local or regional Green Infrastructure Strategy.

8.1.62 Green infrastructure is defined as 'A strategically planned network of natural and semi-natural areas with other environmental features designed and managed to deliver a wide range of ecosystem services such as water purification, air quality, space for recreation and climate mitigation and adaptation. This network of green (land) and blue (water) spaces can improve environmental conditions and therefore citizens' health and quality of life. It also supports a green economy, creates job opportunities and enhances biodiversity.' It is capable of providing several functions at the same time and as a result offers multiple benefits, for social, economic and cultural including reducing impacts of climate change, enhanced biodiversity habitat and species connectivity, providing greater opportunities for sports and recreation, contributing to the communities' health and well-being and providing visual benefits for all.

8.1.63 Management of Newport's Green Infrastructure Strategy should be in place prior to development, and appropriate planning obligations sought. The Green Infrastructure SPG will outline the extent of Newport's green and blue infrastructure and how this policy will be implemented in more detail.

- 8.1.64 Newport has a rich diversity of nature which are recognised at the international, national and local level. Those habitats and species of nature conservation interest represent important environmental resources, and the Council has a duty under various legislation including the Natural Environment and Rural Communities Act (2006), or as amended, Conservation of Habitats and Species Regulations (2017), Countryside and Rights of Way Act (2000), or as amended, and the Town and Country Planning Act (Environmental Impact Assessment) (Wales) Regulations (2017), or as amended, to ensure that they are protected from inappropriate or damaging development. National guidance sets out a clear requirement for the planning system to improve as well as protect the environment. Planning Policy Wales and Technical Advice Note 5: Nature Conservation and Planning (2009) set out this framework identifying nature conservation as an integral part of planning for sustainable development.
- 8.1.65 It is important that biodiversity and resilience of ecosystems considerations are taken into account at an early stage when considering development proposals. In accordance with the Biodiversity and Resilience of Ecosystems Duty (Section 6 Duty) introduced by the Environment (Wales) Act 2016 all reasonable steps must be taken to maintain and enhance biodiversity and promote the resilience of ecosystems and these should be balanced with the wider and economic and social needs of business and communities.
- 8.1.66 Where development is permitted, planning conditions and/or obligations will be used to protect or enhance the green infrastructure and biodiversity benefit. New developments should incorporate new and / or enhanced green infrastructure of an appropriate size, type and standard to ensure no fragmentation or loss of connectivity.

PS16 Conservation of the Historic Environment

PS16 Conservation of the Historic Environment

All proposals will need to ensure the protection, conservation and/or enhancement of Newport's rich historic environment, including listed and non-listed assets.

- 8.1.67 Newport has a wide range of historically important buildings and sites. There are over 400 Listed Buildings, 15 Conservation Areas, 11 Historic Parks and Gardens, 67 Scheduled Ancient Monuments, 4 Archaeologically Sensitive Areas and over 50 square kilometres of landscape registered as being of Outstanding Historic Interest. These nationally and internationally recognised sites are complemented by a variety of locally important historic buildings and sites which this Plan seeks to protect. The protection, retention, safeguarding, conservation and enhancement of heritage assets will be sought, and where new development is proposed that affects the building or site or its setting, this should be of the highest quality.

PS17 Renewable Energy

PS17 Renewable Energy

Renewable and low carbon energy schemes will be supported. Proposals for renewable energy generating development will be subject to all of the following criteria:

- i. there would be no over-riding environmental, including on designated ecological sites;
- ii. there would be no unacceptable impact on amenity; and
- iii. there would be no unacceptable cumulative impacts in combination with existing or consented development.

Within the Local Search Areas, as shown on the Proposals Map, proposals for ground mounted solar energy generation will be permitted or supported subject to the above criteria. Proposals for other development within these areas will only be permitted where it is demonstrated that the renewable energy potential of the Local Search Area would not be undermined.

- 8.1.68 Future Wales sets out two policies relating to the development of Renewable Energy. Policy 17 relates to Renewable and Low Carbon Energy and Associated Infrastructure. This type of development is broadly supported by national government, indicating areas where new large scale wind may be appropriate in Wales and where large scale wind and solar will be inappropriate i.e. where an unacceptable impact on the environment is apparent. Policy 17 supports associated grid infrastructure improvements related to the transmission and distribution of energy. Policy 18 of Future Wales relates to schemes falling under the Development of National Significance consenting regime. These are schemes which would generate between 10MW and 350MW, which are considered and determined by Welsh Government due to their scale and significance.
- 8.1.69 A Renewable and Low Carbon Energy Assessment has been undertaken to provide an understanding of capacity for new energy production within Newport from renewable and low carbon technologies. The Assessment recommends the prioritisation of solar energy, particularly roof mounted solar on new buildings. It is anticipated that new sources of energy production up to 2036, will be predominately through the incorporation of roof mounted solar into development through low and zero carbon building design. Where standalone renewable energy projects are proposed, PS18 will be critical to the consideration of these schemes up to 10MW. Measures to retrofit roof mounted solar, or other low carbon building measures, into historic assets will be assessed in accordance with historic environment policies, and associated legislation where assets are listed.
- 8.1.70 The Assessment indicates Areas of Search for solar development and these are identified as areas where solar development is likely to be acceptable. The feasibility ground mounted solar in these broad locations should be considered prior to the proposal of renewable energy schemes in other parts of Newport.
- 8.1.71 Care will be taken in assessing proposals for renewable energy projects in sensitive, designated areas, such as areas of high landscape quality, and areas of nature conservation, or archaeological or historical importance. The Gwent Levels are recognised as an internationally important resource in terms of landscape and heritage and nationally important for ecology. Proposals which affect the special qualities of the Gwent Levels, or any other protected site, will be resisted unless it can be demonstrated that there will be no significant adverse effects.
- 8.1.72 PS18 will have relevance to a variety of different renewable energy projects, however the most common form of technologies proposed in Newport have tended to be solar and wind. Newport is outside of any pre-assessed area for wind turbines, as outline in Future Wales. This means that the Newport area has not been identified for large scale on-shore wind energy production, nonetheless proposals for new wind turbines may be appropriate if in accordance with the policy framework.
- 8.1.73 Policy 16 of Future Wales identifies Newport as a priority area for District Heat Networks, requiring the exploration and investigation into the feasibility of these. This matter will be addressed by the more detailed policies of the Plan.

PS18 Minerals

PS18 Minerals

The Plan will sustainably contribute towards meeting regional demand for mineral resources by:

- i. Promoting the appropriate use of secondary and recycled aggregates;
- ii. Safeguarding hard rock and sand and gravel resources from development which may preclude its potential future extraction;
- iii. Safeguarding existing and potential wharves and rail infrastructure at Newport Docks for the sustainable transportation of aggregate;
- iv. Supporting proposals for the winning and working of minerals in the regional context, whilst having appropriate regard to local constraints.

8.1.74 Both national and regional planning policy require that mineral resources are managed in a sustainable manner.

8.1.75 Land use planning policy guidance for mineral extraction and related development is set out in Planning Policy Wales (Edition 11) and supplemented by Mineral Technical Advice Note 1: Aggregate (2004) and Mineral Technical Advice Note 2: Coal (2009). Mineral planning is considered at the regional scale, the overall consideration of supply and demand for the South Wales region is carried out by the South Wales Regional Aggregates Working Party (SWRAWP). The role of the SWRAWP is to examine issues of aggregate provision and to produce a Regional Technical Statement (RTS) which sets out the strategy for the provision of aggregates in South Wales.

8.1.76 There is no current landbank in Newport and resources are limited. National Planning Policy requires local authorities to maintain a landbank to ensure levels of supply are sufficient to meet anticipated need. The RTS Second Review (RTS2) (2020), as corrected by Welsh Government Policy Clarification Letter dated 11 November 2021, requires Newport to make provision for the supply of primary land-won aggregate, specifically for Carboniferous Limestone, totalling at least 11.3 million tonnes over the RLDP period. Applications for mineral workings will be considered on a case-by-case basis, recognising that circumstances can change in the future. The RTS2 requires Newport to safeguard potential mineral resources, continue the use of marine, secondary and recycled aggregates and protect wharves and rail for the sustainable transportation of aggregate.

8.1.77 Newport currently receives land won minerals from cross boundary locations, liaising with adjoining authorities to continue to ensure an adequate supply is maintained. Newport sand and gravel wharves supply this much needed aggregate to cross boundary locations.

8.1.78 Minerals from primary sources can clearly only be worked where they occur, and in many cases the nature of the mineral is responsible for the particular characteristic of the landscape which may be worthy of protection. The Plan seeks to encourage developers to ensure the best and most efficient use of all available resources. A number of materials sometimes considered as waste are effective substitutes for natural aggregates, known as Secondary Aggregates. Such materials include power station fuel ash, steelwork slag, demolition waste, road scalpings and spent rail ballast. Increased use of secondary aggregates is encouraged wherever possible.

PS19 Waste Management

PS19 Waste Management

To delivery sustainable waste management in Newport, Waste will be managed in the following ways:

- i. Supporting waste prevention, reuse and the provision of facilities that use recycled or composted products
- ii. Promoting and supporting additional sustainable waste management facilities in a manner that follows the waste hierarchy and the principles of an integrated and adequate network of waste installations; nearest appropriate installation; self-sufficiency and protection of human health and the environment;
- iii. Supporting the provision and maintenance of sustainable waste management storage and collection arrangements in all appropriate new developments.

8.1.79 Planning Authorities are required by European Directives and National Guidance to ensure that waste is recovered or disposed of without harming the environment with a target of achieving net zero waste by 2050. Two key aspects of achieving this are to minimise the production of waste and the promotion of a circular economy, in line with then Waste Hierarchy.

8.1.80 In accordance with Welsh Government's TAN 21 'Waste' (2014) and the aims of 'Beyond Recycling' (2021), the Council will work with others within the South East Wales region to monitor waste arisings and capacity requirements. It will respond to identified needs by contributing towards the provision of an integrated and adequate network of waste management facilities across the region.

8.1.81 All appropriate new development should include provision for the storage, recycling and management of waste. This will encourage waste reduction, recycling, composting and separation at source in order to contribute towards meeting waste management targets.

9 Review of Development Management Policies

9.1 An assessment has been undertaken to consider the development management policies adopted by the Local Development Plan. This exercise seeks to build upon the Review Report to provide an indication of whether these policies will be carried forward, updated or deleted. Where policies are carried forward, they may be subject to minor changes, whereas policies which are updated will be taken forward, but amendments are likely to be made to reflect changes to national requirements or the local context. In some cases policies may have been found to have limited efficacy during the implementation and monitoring of the Local Development Plan, or in some cases, may be replaced by a different policy approach. The outcome of further work to review these policies will be presented in the Deposit Plan, where policies may be regrouped or reordered to reflect their links to the Objectives of the Replacement Local Development Plan.

General Policies		Commentary	Recommendation
GP1	Climate Change	Revision necessary to reflect spatial strategy over the extended period and to align with the Newport Climate Strategy. Opportunity to promote the policy to a strategic policy, reflecting the importance of the climate emergency.	Updated with amendments and promote the policy. Draft policy forms part of the Preferred Strategy.
GP2	General Amenity	Functioning effectively.	Carry forward with minimal changes.
GP3	Service Infrastructure	Functioning effectively.	Carry forward with minimal changes.
GP4	Highways and Accessibility	Amendments required to consider Active Travel and transport hierarchy.	Update required to reflect the transport strategy.
GP5	Natural Environment	Amendments to include signposting to enhancement requirements, Bee Friendly City status, outcome of HRA and ISA.	Update to strengthen policy, reflect changes to national planning policy, outcomes of environmental assessments and strategic policy changes.
GP6	Quality of Design	Amendments required to clearer define "Good Design," and opportunity to stress the importance of placemaking.	Update required to align policy with the strategic policy for Sustainable Placemaking and Good Design and to provide clarity to support implementation.
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.	Delete, overarching policy matters to be addressed through strategic policy for sustainable placemaking and matters to be split and addressed through individual detailed policies for air quality, land contamination, overheating and noise and any other environmental health issues.
Environment Policies		Commentary	Recommendation
CE1	Routeways, Corridors and Gateways	Functioning effectively	Update to more clearly link to green infrastructure and greening of main roads and transport corridors.

CE2	Waterfront Development	Functioning effectively	Carry forward with minor amendments
CE3	Environmental Spaces and Corridors	Functioning effectively	Carry forward with minor amendments
CE4	Historic Landscapes, Parks, Gardens and Battlefields	Functioning effectively	Carry forward with minor amendments
CE5	Locally Listed Buildings and Sites	Review whether a local list is to be produced	Update to be linked to a new local list.
CE6	Archaeology	Functioning effectively	Carry forward with minor amendments
CE7	Conservation Areas	Functioning effectively	Carry forward with minor amendments
CE8	Locally Designated Nature Conservation and Geological Sites	Functioning effectively	Carry forward with minor amendments
CE9	Coastal Zone	Revisions needed to reflect Technical Advice Note 15, National Marine Plan, Shoreline Management Plan 2 and Newport Flood Risk Management.	Update with amendments to reflect changes to national and local context.
CE10	Renewable Energy	Revision necessary to reflect government and local targets, with the policy text updated to be more in line with national policy. Opportunity to promote to strategic policy as a result of incorporation of targets.	Update to reflect changes to national policy, recommendations made by the evidence base and the Newport Local Area Energy Plan. Draft policy forms part of the Preferred Strategy.
SP5	Water Resources	Functioning effectively, but there is an opportunity to consider demoting the policy or incorporating it with the strategic climate change policy.	Update to reflect the role of the policy in decision taking and possible integration with climate policy.
New	Low Carbon Building		Further consideration to be given to a low carbon building policy.
New	District Heat Networks		Further consideration to be given to a district heat network policy.
Housing Policies		Commentary	Recommendation
H1	Housing Sites	Revision necessary – revised level of housing growth over new plan period in relation to housing requirement and spatial strategy.	Update to outline housing site allocations.
H2	Housing Standards	Review whether the policy can further reflect updates in design and lifetime development needs.	Updates to wording to reflect latest changes to national policy, standards and guidance.

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	Update required to indicate targets for different housing types and tenures, if necessary, and to reflect higher density ambitions. Changes will be made in line with the emerging Local Housing Market Assessment.
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.	Update to targets as informed by the emerging Local Housing Market Assessment.
H5	Affordable Housing Exceptions	Revision necessary –required greater clarification on what is local need.	Update to be informed by Local Housing Market Assessment and consideration of what is required to demonstrate local need.
H6	Sub-division of Curtilages, Infill and Backland Development	Functioning effectively	Carry forward with only minor amendments where necessary.
H7	Annexes to Residential Dwellings	Functioning effectively	Carry forward with only minor amendments where necessary.
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.	Update needed and will be informed by the Housing in Multiple Occupation Research Report.
H9	Housing Estate Regeneration	Update in line with successful delivery or Alway, Ringland and Pillgwenly Regeneration schemes. Identify specific allocations if required.	Update to reflect progress and consider allocations in line with an understanding of any estate regeneration strategies.
H10	Conversions in the Countryside	Functioning effectively	Carry forward with only minor amendments where necessary.
H11	Outbuildings and Extensions to Conversions	Functioning effectively	Carry forward with only minor amendments where necessary.
H12	Replacement Dwellings in the Countryside	Functioning effectively	Carry forward with only minor amendments where necessary.
H13	Extensions to Dwellings in the Countryside	Functioning effectively	Carry forward with only minor amendments where necessary.
H14	Caravans	Functioning effectively	Carry forward with only minor amendments where necessary.
H15	Gypsy and Traveller Transit Accommodation	Revision Necessary – to reflect updated needs assessment.	Update to reflect GTAA 2021 and regional transit needs evidence base.
H16	Gypsy and Traveller	Revision Necessary – to reflect updated needs assessment.	Update to reflect GTAA 2021.

	Residential Accommodation		
H17	Gypsy and Traveller Accommodation Proposals	Functioning effectively	Update to reflect GTAA 2021.
New	One Planet Development		Further consideration to be given to a locally specific One Planet Development policy.
New	Self and Custom Build		Further consideration to be given to a self and custom build policy.
New?	Tourism Accommodation		Further consideration to be given to a policy directly related to proposals falling in to Use Classes C5 and C6.
Employment Policies		Commentary	Recommendation
EM1	Employment Land Allocations	Revision Necessary. Policy to be informed by the recommendations of the Employment Land Review 2022.	Updated to reflect recommendations made by the evidence base and in line with the strategic policy for employment land. There is potential to split the policy to provide site allocation policies for those proposals where certainty of delivery is needed and constraints need to be addressed.
EM2	Newport Docks	Functioning effectively	Carry forward with potential minor amendments to reflect most up to date proposals.
EM3	Alternative uses of Employment Land	Revision Necessary - Revision Necessary. Policy to be informed by the recommendations of the Employment Land Review 2022. Revisions will reflect growth strategy; impacts of Covid-19; marketing requirements; definition of commercial leisure development; and restrictions on Change of Use of recently developed employment land.	Updated to reflect recommendations made by the evidence base and to address issues with implementation.
New	Rural Diversification		Further consideration to be given to a policy to support and control the rural economy, rural enterprises and rural diversification.
Transport Policies		Commentary	Recommendation
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.	Deleted to reflect changing priorities away from major road building and towards increasing capacity of other modes of movement and travel in line with the Transport Hierarchy.

T1	Railways	Functioning effectively	Update to reflect changing priorities for both local and strategic rail programmes and projects.
T2	Heavy Commercial Vehicle Movements	Functioning effectively	Carry forward with some changes needed to reflect the wider transport strategy.
T3	Road Hierarchy	Functioning effectively	Carry forward with any necessary changes to reflect wider approach to traffic management.
T4	Parking	Revision required – to reflect national policy requirements, consider boundaries of parking zones and ULEV charging implications.	Update to widen scope to address a range of parking needs, including ULEV and cycle parking within policy.
T5	Walking and Cycling	Functioning effectively	Update to identify and safeguard active travel routes and network maps.
T6	Public Rights of Way Improvement	Functioning effectively	Carry forward with minor changes where necessary.
T7	Public Rights of Way and New Development	Functioning effectively	Ca Carry forward with minor changes where necessary.
T8	All Wales Coast Path	Should this be combined with Policy T7?	Deleted to be merged with policy T7.
Retailing and the City Centre Policies		Commentary	Recommendation
R1	City Centre Schemes	Revision necessary to all City Centre Retail Policies. Changes are required to reflect the changing way in which people use Newport City Centre and to address challenges, such as vacancy rates, falling footfall and pressures of out of town retail.	Update with amendments to reflect recommendations of the evidence base, and City Centre Masterplan and the emerging City Centre placemaking plan.
R2	Primary Shopping Frontage		Update required to reflect the changing spatial aspect of the Primary Shopping Area and to ensure the policy isn't overly restrictive to change.
R3	Non-Retail Uses in Secondary City Centre Shopping Areas		Update required to reflect the changing spatial aspect of the Primary Shopping Area and to ensure the policy isn't overly restrictive to change.
R4	Non-Retail Uses in Other City Centre Shopping Areas		Update to define complementary uses and commercial leisure development in line with national policy.

R5	Café Quarter		Deleted. Policy assessed by Retail and Leisure Study 2019 as having limited efficacy. Evidence proposes supporting food and beverage leisure elsewhere in the City.
R6	Retail Proposals in District Centres	Revisions to respond to health of defined centres and provide clarity relating to application of tests, in line with strategic policy.	Update to reflect strategic policy and the retail strategy.
R7	Non-Retail Uses in District Centres		Update to reflect strategic policy and the retail strategy.
R8	Small Scale Retail Proposals	Revisions to provide clarity relating to the application of policies and the management of proposals outside of the urban boundary.	Update to provide clarity on how the policy will be applied.
R9	Change of Use to Non-Retail Uses Inside Local Centres		Update to provide clarity on how the policy will be applied.
R10	New Out of Centre Retail Sites	Revision necessary to all Out of Center Retail Polices. Pressures of out of town retail on the vitality and viability of the City Centre remain apparent. Policies to be reviewed to ensure this pressure is managed and seek to address a wider range of uses in line with the retail strategy.	Update to reflect strategic policy and the retail strategy.
R11	Development of Existing Out-of-Centre Retail Sites		Update to reflect strategic policy and the retail strategy.
New	City Centre Housing Mix		Further consideration to be given to a City Centre housing mix policy to overcome an identified concentration of affordable housing of smaller housing types in the City Centre area. Any policy will be informed by the emerging Local Housing Market Assessment and the Housing Supply Review 2022.
New	Takeaways		Further consideration to be given to a policy addressing the location of food takeaways and promote the consideration of health impacts as a part of relevant proposals.
Community Facilities & Other Infrastructure Policies		Commentary	Recommendation
CF1	Protection of Playing Fields, Land and Buildings Used for Leisure, Sport, Recreation and Play	Functioning effectively	Update to reflect outcomes of an Open Space Assessment and any new standards set out by Fields in Trust.

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	Delete and merge with infrastructure and planning obligations policy.
CF3	Water Based Recreation	Functioning effectively	Carry forward with minor changes to incorporate requirements regarding lifeboats and leisure access.
CF4	Riverfront Access	Functioning effectively	Carry forward with minor changes to incorporate placemaking.
CF5	Usk and Sirhowy Valley Walks	Update to ensure this covers the requirement of PROW strategy	Carry forward with minor changes to incorporate other walks and placemaking.
CF6	Allotments	Functioning effectively	Carry forward
CF7	Horse Related Developments	Functioning effectively	Carry forward
CF8	Tourism	Amendments required to consider what is defined as tourism, very permissive at present possible implications from temporary accommodation from housing stock.	Update is needed to more clearly define the scope of the policy to exclude development falling into Use Classes C5 and C6.
CF9	Celtic Manor	Is a specify policy still necessary, can this be incorporated into CF8?	Delete and merge with Policy CF8.
CF10	Commercial Leisure Developments	Amendments required to consider what is defined as commercial leisure developments	Update to ensure cross over with retail and commercial policies is minimised or potential to delete if found to be sufficiently address through the changes to the retail and commercial policies.
CF11	Outdoor Leisure Developments	Functioning effectively	Carry forward.
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.	Updates to clarify wording of policy and supporting text.
CF13	School Sites	Revisions will be necessary to reflect the proposed strategy.	Updates to reflect school provision required to address the strategy.
New	Utilities/ Electricity Infrastructure		Further consideration to be given to a policy directed towards addressing utilities infrastructure, specifically linked to overcoming grid capacity issues.

New	Digital Infrastructure		Consideration to be given to a policy to support the development and enhancement of digital infrastructure in line with Future Wales.
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.	Policy to be retained with clarification provided in wording. Policy to be demoted to a Development Management policy, supporting the delivery of wider infrastructure objectives in line with PS6.
Minerals Policies		Commentary	Recommendation
M1	Safeguarding of Mineral Resource	Revision Necessary – AMR highlighted that further training is needed every year. Review whether category 2 minerals should be safeguarded.	Update required to provide clarity regarding implementation of policy.
M2	Mineral Development	Functioning effectively	Carry forward
M3	Oil and Gas	Question whether this policy goes beyond national policy	Consideration to be given to deleting this policy.
M4	Wharves and Rail	Functioning effectively	Carry forward
Waste Policies		Commentary	Recommendation
W1	Sites for Waste Management Facilities	Review to ensure adequate land supply to meet requirements of PPW.	Update to bring policy wording up to date and reflect most recent legislative, local and policy contextual changes.
W2	Waste Management Proposals	Review to ensure adequate land supply to meet local requirements.	Update to bring policy wording up to date and reflect most recent legislative, local and policy contextual changes.
W3	Provision for Waste Management Facilities in Development	Functioning effectively	Carry forward

Appendices

1 Supplementary Planning Guidance

Adopted SPGs	Update Required?	Priority?
Shopfront Design SPG	Yes	
Sustainable Travel SPG	Yes	Yes
Planning Obligations SPG	Yes	Yes
Affordable Housing SPG	Yes	Yes
Archaeology and Archaeologically Sensitive Areas SPG	Yes	Yes
Wildlife and Development SPG	Yes	Yes
House Extensions and Domestic Outbuildings SPG	Yes	
New Dwellings SPG	Yes	
Flat Conversions SPG	Yes	
Waste Storage and Collection	Yes	Yes
Parking Standards SPG	Yes	Yes
Housing in Multiple Occupation SPG	Yes	Yes
Security Measures for Shopfronts and Commercial Premises SPG	Yes	
Mineral Safeguarding	Yes	
Outdoor Play Space Provision	Yes	
Trees, Woodland, Hedgerows and Development Sites	Yes	
Air Quality (SPG) (Feb 2018)	Yes	
New SPGs		
Low Carbon Building		
Green and Blue Infrastructure		

2 National Context

Legislative Framework	
Title	Purpose and Implications
The Planning (Wales) Act 2015	The Planning (Wales) Act (PWA) 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 PWA addresses 5 key objectives which includes strengthening the plan-led approach to planning. The PWA strengthens the plan led approach and introduces a legal basis for the preparation of a National Development Framework (NDF) and Strategic Development Plans (SDP). It is a statutory requirement for Welsh Ministers to produce a National Development Framework. Future Wales: the National Plan 2040 forms the National Development Framework. The key implication for the Local Development Plan is the need to consider a review of the LDP once new or updated version of the NDF and SDP are published or adopted to ensure all tiers of the development plan are consistent.
The Town and Country Planning (Local Development Plan) (Wales) (Amendment) Regulations 2015	<p>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:</p> <ul style="list-style-type: none"> • remove the statutory requirement to advertise consultation stages in the local press; • allow 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. <p>The amended LDP Regulations came into in 2015 along with updates to Planning Policy Wales and The Development Plan Manual, which are now on their 11th and 3rd editions, respectively and support the preparation of the Local Development Plan.</p>
The Well-being of Future Generations (Wales) Act 2015	<p>The Well-being of Future Generations (Wales) Act 2015 (WBFGA) seeks to put 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. Through the application of seven well-being goal, the WBFGA requires:</p> <ul style="list-style-type: none"> • 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. <p>The WBFGA requires the Local Development Plan to consider the outcomes of Local and Regional Well-being Plans. Sustainability is a core principle of the LDP and there will be clear links between the LDP and Well-being Plan.</p>
The Environment (Wales) Act 2016	The Environment (Wales) Act 2016 received Royal Assent in March 2016 and sits alongside both the PWA and WBFGA 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.
Historic Environment (Wales) Act 2016	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.
Public Health (Wales) Act 2017	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 forms part of the Integrated Sustainability Appraisal.

National Policies and Strategies	
Title	Purpose and Implications
Planning Wales Technical Notes Policy and Advice	<p>Planning Policy Wales Edition 11 (PPW) was published in February 2021 and forms the fourth update to PPW since the adoption of the LDP in January 2015. Most recently, PPW was redrafted to address the implications of the publication of Future Wales: The National Plan 2040 and ensure integration between the highest tiers of national planning policy. PPW sets out the land use planning policies, key planning principles and overarching national sustainable placemaking outcomes for Wales. Consultation on targeted changes to clarify policy around Net Benefit for Biodiversity and resilience of Ecosystems closed on 31 May 2023 and updates are expected to come into force during late 2023.</p> <p>Since the adoption of the LDP, the following changes have been made to Technical Advice Notes (TAN) and Mineral Technical Advice Notes (MTAN) in Wales:</p> <p>TAN 1: Joint Housing Land Availability Studies was revoked by WG in March 2020.</p> <p>TAN 4: Retail and Commercial Development was updated in November 2016.</p> <p>TAN 8: Planning for Renewable Energy was revoked by WG in February 2021.</p> <p>TAN 11: Noise is being updated to incorporate air quality and soundscape guidance, consultation on changes closed on 20 January 2023.</p> <p>TAN 12: Design was updated in March 2016.</p> <p>TAN 14: Coastal Planning was updated in November 2021. Further updates will see TAN 14 combined with TAN 15 consultation responses are being reviewed.</p> <p>TAN 15: Development and Flood Risk was updated in November 2021. Further updates are coming forward to incorporate TAN 14 Coastal Planning and consider the flood impacts of Climate Change to form TAN 15: Development, Flooding and Coastal Erosion. Consultation on further amendments closed on 17 April 2023.</p> <p>TAN 20: Planning and the Welsh Language updated in October 2017.</p> <p>TAN 21: Waste updated in February 2017.</p> <p>TAN 24: The Historic Environment was produced in May 2017.</p> <p>Current work is being undertaken on reviewing intensive agriculture.</p>
Future Wales	<p>Welsh Government published Future Wales: The National Plan 2040 (Future Wales) in February 2021 and it forms the highest tier of development plan in Wales. Future Wales comprises the National Development Framework and sets out the 20-year spatial framework for land use in Wales, providing a context for the provision of new growth. It concentrates on development and land use issues of national significance which the planning system is able to influence and deliver. Future Wales replaces the Wales Spatial Plan which was revoked following publication of Future Wales. Within Future Wales Newport is identified as a National Growth Area. The Policy notes that Welsh Government supports Newport as the focus for regional growth and investment and supports 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.</p>
Welsh National Marine Plan	<p>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 WNMP is a key consideration.</p>

Natural Resources Policy	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 produced by Natural Resources Wales (NRW), 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	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. The LDP will take a risk based approach to the consideration of flood risks and consequences.
Llwybr Newydd: the Wales transport strategy 2021	Welsh Government published Llwybr Newydd: the Wales transport strategy in March 2021 (WTS). The overarching vision for the strategy is to achieve 'An accessible, sustainable and efficient 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.
Building Better Places (July 2020)	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.
Net Zero Wales Plan for Carbon Budget 2 (2021 – 2025)	Welsh Government published Net Zero Wales Plan for Carbon Budget 2 (2021 – 2025) (NZW) in September 2022. NZW is a strategy for achieving net zero targets over a five-year period through breaking down targets and identifying initiatives, including a number of land use based initiatives relating to Welsh Government policy, decision making and land holdings.
Nature Recovery Action Plan for Wales 2020-2021	Welsh Government refreshed the Nature Recovery Action Plan (NRAP) in 2020. It forms the biodiversity strategy and action plan for Wales. The refresh takes into account the growing evidence around the scale of the loss of biodiversity and the changing policy context in Wales.
Roads Review Report February 2023	Welsh Government appointed an independent panel to review investment into road schemes and make recommendations for future road investment in Wales. The final report was published in February 2023 and sets out a series of principals for future investment, which have relevance when considering new developments and implementing the development plan and WTS.

3 Regional Context

Other Regional Strategies and Programmes	
<i>Western Gateway</i>	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.
<i>Natural Resource Wales Area Statements</i>	Natural Resources Wales (NRW) is required to prepare Area Statements under section 11 of the Environment (Wales) Act, 2016. These are developed to help facilitate the implementation of the National Natural Resources Policy (NNRP) 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 ecosystem resilience is needed 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 well-being, 4. Ways of Working – identifying the benefits of strategic regional collaboration and identifying that need to be done at a regional scale to maximise local delivery and natural resource benefits.

4 Local Context

Other Plans and Strategies	
Page 424	<p>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, having developed a multitude of training and development routes for future workers. The City is experiencing a rapidly expanding tourism sector. Newport has a pivotal role in the success of both the Cardiff Capital Region and Western Gateway Partnerships. 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.</p>
	<p>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 had been approved.</p>
	<p>The requirements of the Active Travel Act 2013 have meant the Council has undertaken a series of existing and integrated Route Maps, which form part of the Local Development Plan Evidence Base. 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.</p>
	<p>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.</p>
	<p>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 Well-being objectives and Nature Recovery Plan objectives. The report shows a positive approach and highlights those projects and ambitions for future working. An aim of the Council, and PSB, is to develop a Newport-wide Green Infrastructure Plan. The Local Development Plan is supported by a Green Infrastructure Assessment.</p>
	<p>Newport has 11 Air Quality Management Areas (AQMA) and an SPG was adopted in 2018 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 11 and the new development allocations consider impacts on air quality at the strategic scale. A new Air Quality Action Plan will be developed by the Council. The publication of the Clean Air Plan for Wales: Healthy Air, Healthy Wales (2020) clearly establishes this topic as a concern.</p>
	<p>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 (SuDS) 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. SAB and the Local Planning Authority site alongside one another with different roles and responsibilities which have been considered.</p>
	<p>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.</p>

5 Evidence Base and Supporting Documents⁵

Regional Evidence Base Documents
Larger than Local Employment Study, April 2020
Regional SFCA Stage 1 Report, JBA, November 2022
Regional Renewable and Low Carbon Energy Report, Carbon Trust, December 2020
<i>Green Belt and Green Wedge Study</i>
<i>Gypsy Traveller Transit Needs Assessment</i>
<i>Regional Housing Needs Assessment</i>
Local Evidence Base Documents
Demographic Study, Edge Analytics, September 2022
Employment Land Review, BE Group, February 2022
Candidate Site Register, October 2023
Retail and Leisure Study 2019, Nexus, November 2019
Retail and Leisure Study Supplementary Report, Nexus, July 2023
Urban Capacity Study, Lambert Hampton Smith, April 2022
Housing Supply Review, Lambert Hampton Smith, April 2022
Newport Renewable and Low Carbon Energy Report, November 2019
Green Infrastructure Assessment, CBA, February 2022
Minerals Report, June 2023
<i>Plan Wide Viability Assessment</i>
<i>Housing in Multiple Occupation Research Report</i>
<i>Gypsy Traveller Accommodation Assessment</i>
<i>Local Housing Market Assessment</i>
<i>Infrastructure Delivery Plan</i>
<i>Transport Modelling Assessment</i>
Background Papers
Site Assessment Report
Employment Land Background Paper
Spatial Strategy and Urban Boundary Review
Formulating the Growth Strategy
Settlement Assessment (Village Appraisal)
Housing Supply Background Paper
Issues, Vision and Objectives Background Paper
Retail and Leisure Background Paper
Health Background Paper
Community Infrastructure and Planning Obligations Background Paper
Climate Change Background Paper
Waste Background Paper
Transport Background Paper
Minerals Background Paper
Renewable Energy Background Paper
Historic Environment Background Paper
Flood Risk Background Paper
Green Infrastructure and Biodiversity Background Paper
<i>Public Open Space and Sports Leisure Background Paper</i>
<i>Housing Policies Background Paper</i>
<i>Rural Communities Policy Background Paper</i>
<i>Landscape Background Paper</i>

⁵ Those in Italics will be published with the Deposit Plan. This is not a definitive list, and as such the need for additional evidence may emerge as a result of the Preferred Strategy consultation.

6 Acronyms and Abbreviations

AMR – Annual Monitoring Reports

CCR - Cardiff Capital Region

CS – Candidate Sites

CSR – Candidate Sites Register

Future Wales – Future Wales: The National Plan 2040

HRA – Habitats Regulations Assessment

ISA – Integrated Sustainability Appraisal

KPP – Key Planning Principles

LDP – Local Development Plan

NSPOs – National Sustainable Placemaking Outcomes

PPW – Planning Policy Wales

PSB – Public Service Board

RLDP – Replacement Local Development Plan

SAC – Special Area for Conservation

SDP – Strategic Development Plan

SEWSPG – South-East Wales Strategic Planning Group

SPA – Special Protection Area

SPG – Supplementary Planning Guidance

SSSI – Site of Special Scientific Interest

TAN – Technical Advice Note

ULEV – Ultra Low Emissions Vehicles

WBFGA – Well-being of Future Generations Act 2015

WG – Welsh Government

Newport Replacement Local Development Plan 2021-2036

Easy Read Preferred Strategy

September 2023

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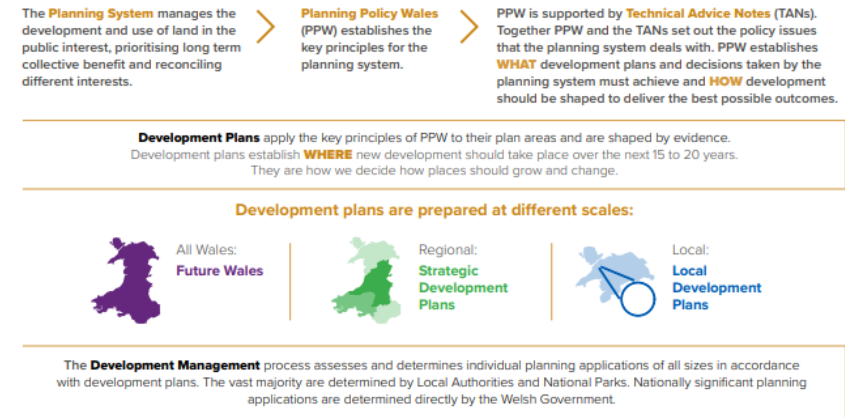
Introduction

The Council is required to maintain an up to date Local Development Plan (LDP). An LDP sits within a wider planning framework, which includes other Development Plans. The following figure, is extracted from Planning Policy Wales and shows the wider planning framework in Wales.

The current planning context includes a National Development Framework, which is Future Wales: The National Plan 2040 (Future Wales). A Strategic Development Plan will site at the regional scale, but is not yet under preparation, which this likely to emerge in the next few years.

The Replacement Local Development Plan (RLDP) will ensure that the Local Development Plan remains relevant and up to date in light of changes to the national context and local circumstances. The RLDP will be able to support the expansion of Newport by directing land uses to the

most appropriate locations and maximise benefits of development for existing and new communities, ensuring identified issues, opportunities and challenges are addressed.



The Preferred Strategy outlines the national, regional and local context and identifies the associated issues, challenges and opportunities anticipated over the period 2021-2036. A Vision has been established which responds to key issues and sets out an ambition for the RLDP. Ten objectives provide more detailed aims to be achieved through the RLDP.

A preferred growth and spatial strategy is outlined and Key Sites to be allocated to deliver these have been identified. A strategic framework has been outlined and provides 16 policies which have the most importance for the delivery of the preferred strategy. These will be supported by more detailed policies for development management. Detailed recommendations have been outlined relating to the review of 2011-2026 LDP policies.

Consultation on the Preferred Strategy is the next formal stage of plan making and develops consensus on key elements of the RLDP. The Preferred Strategy will be consulted on for an 8-week period alongside other technical and supporting documents. Following this stage, further work will be undertaken to assess all Candidate Sites, draft policies for

development management, prepare an initial consultation report, review the monitoring framework and consider comments made on the Preferred Strategy.

National, Regional and Local Context

The Local Development Plan preparation is informed by a range of context and understanding at the national, regional and local scale. Firstly, the local historic and geographic context can be described as:

National policy, strategies and legislation make up the national context, several documents have been identified and inform the preparation of the Replacement Local Development Plan either through the identification of issues, alignment with objectives or as a part of the wider planning policy context. The wider planning context includes Future Wales: The National Plan 2040 (Future Wales), which forms part of the Development Plan.

Relevant policies set out within Future Wales have been identified as:

Policy 1 – Where Wales will grow	Policy 9 – Resilient Ecological Networks and Green Infrastructure
Policy 2 – Shaping Urban Growth and Regeneration – Strategic Placemaking	Policy 11 – National Connectivity
Policy 3 – Supporting Urban Growth and Regeneration – Public Sector Leadership	Policy 12 – Regional Connectivity
Policy 4 – Supporting Rural Communities	Policy 13 – Supporting Digital Communications
Policy 5 – Supporting the rural economy	Policy 15 – National Forest
Policy 6 – Town Centre First	Policy 16 – Heat Networks
Policy 7 – Delivering Affordable Homes	Policy 33 - National Growth Area – Cardiff, Newport and the Valleys
Policy 8 – Flooding	Policy 34 – Green Belts in the South East
	Policy 36 – South East Metro

Regional Context

While limited progress has been made towards developing a Strategic Development Plan for South East Wales, a number of regional strategies,

projects and partnerships are apparent and address local issues or seek to enhance the region and sub-regional assets. These are:

- Cardiff Capital Region and City Deal
- South East Wales Metro
- Western Gateway
- Natural Resource Wales Area Statements
- Minerals Regional Technical Statements
- Waste Monitoring
- Severn Estuaries Partnership

Additionally, all of Newport’s adjoining local authorities are progressing the review of their own Local Development Plans, creating an opportunity to work together to address cross boundary issues to maximise opportunities.

Local Context

Newport City Council (NCC) has adopted a range of corporate strategies, with the Council delivering a number of programmes associated with these. The Corporate Strategy is the overarching plan of the Council and the Local Development Plan, including the Preferred Strategy seeks to concur with the objectives and priorities set out within this document.

Further NCC strategic plans are:

- The Digital Strategy 2015-2020
- The Strategic Equalities Plan 2020-2024
- The Welsh Language Strategy 2022-2027
- Climate Change Plan 2022-2027
- Local Area Energy Plan 2022

These are supported by a number of other resources, including the Newport Economic Growth Strategy 2020 and Biodiversity and Resilience of Ecosystems Duty Report 2019.

Issues, Challenges and Opportunities

The following issues, challenges and opportunities have been informed by the national, regional and local context. A number of issues have informed

the development of the vision, objectives and preferred strategy. These are set out in full in Issues, Vision and Objectives background paper. These are summarised as the following Key Issues:

National and Regional

- Newport has a nationally important role and an increasing strategic role. The City forms part of the Cardiff Capital Region and Western Gateway.
- Transport capacity issues, with the South East Wales Metro forming an opportunity to address issues as well as support modal shift through new active and public travel infrastructure.
- Need to protect nationally and international environmental and historic designations, including Regionally Important Geodiversity Sites.
- Managing strategic flood risks, including the effects of climate change, in line with national policy.
- Mitigation, adaptation and resilience building to the causes and impacts of climate change to meet national targets, including supporting the growth of the National Forest.
- Maintaining separation from surrounding urban areas such as Cardiff and Cwmbran through the Green Belt.
- Welsh Government target to achieve net zero waste by 2050.

Economic

- Need to identify a suitable amount of land to meet the requirement for 77ha of employment land identified by the evidence base.
- Need to support upskilling and education of the local population. Including maximising opportunities to meet skills gaps in delivering solutions to the climate change challenge.
- Support growth of the rural economy, including sustainable tourism.
- Supporting Covid-19 post-pandemic and Brexit economy recovery.
- Maximise economic opportunities through historic environment, including through culture, tourism and regeneration. One challenge is the need for investment in managing, protecting and enhancing these.

Environmental

- Maintaining a brownfield-led strategy is a challenge and the identification of greenfield sites will require the identification of appropriate infrastructure, e.g. active travel routes, to support connectivity and alleviate impact on roads.
- Need to support the sustainable management of natural resources, including energy, trees, minerals and waste, in line with Natural Resource Wales policies and Area Statements. This includes energy, trees, minerals and waste.
- Reducing resource consumption and promoting circular economies, including ensuring the recycling of materials and sustainable sourcing of minerals.
- Protection of Best and Most Versatile Agricultural Land.
- Efficient use and improvements to the quality of water resources.
- Overcoming air quality issues, reducing impacts from transport, fuel consumption and agriculture.
- Addressing the local climate change and ecological emergencies to meet local targets and ecosystem resilience.
- Maximising opportunities for biodiversity enhancement and net gain, as well as explore opportunities for existing and new green infrastructure corridors to improve connectivity, particularly within urban areas.
- Preserving and enhancing landscape features and protection Special Landscape Areas for their special characteristics.
- Consider a settlement hierarchy, urban and village boundaries, and opportunities for development in rural areas.
- Consider whether the current Green Wedge designations be preserved, amended or removed.
- Combatting pressure from development in the coastal area and levels due to their outstanding visual, historic and ecological interest.
- Promote energy from low carbon sources to address demand for heating and transport, including exploring opportunities for district heat networks, encouraging more energy efficient buildings and supporting more renewable and low carbon energy production schemes.

Social

- Need to address housing requirements arising from forecast population growth and identify a suitable amount of land to support these. This includes understanding shortfalls in delivering the 2011-2026 LDP requirements.
- Delivery of a diverse range of new homes of different types and tenures in different locations, addressing specific needs, affordable housing needs and accessibility to all.
- Identification of needs for Gypsy and Traveller accommodation and delivery necessary accommodation.
- Promote high-quality development, that is safe and accessible, that will create and regenerate places for people, and will maintain and enhance community and settlement identity.
- Ensuring development takes place in sustainable locations, supported by the necessary social, environmental and physical infrastructure, including employment opportunities.
- Need to support the provision, protection and improvement of open spaces, play spaces and sporting facilities, as well as supporting the provision of the green infrastructure networks.
- Reducing the need to travel and encouraging sustainable travel choices is a challenge and opportunity.
- Negating the polluting impacts of development is important for avoiding impacts on health.
- Creating safer environments and decreasing opportunities for crime. Negating the polluting impacts of development is important for avoiding impacts on health.
- Creating safer environments and decreasing opportunities for crime.
- Promote regeneration for benefits of addressing deprivation and supporting the foundational economy.
- Ensuring the consideration of health and well-being in decision making, including supporting a reduction in health inequalities.
- Delivering local services and facilities to meet day to day needs of communities in accessible locations.

- Support improved access to education and training opportunities to bring levels more in line with Wales as a whole.
- Tackling fuel poverty through supporting the transition to net zero and decarbonisation.
- Resilience and protection for existing and new communities against the impacts of climate change, specifically flooding.

Cultural

- Promotion of placemaking in planning and design to support balanced communities, foster a shared sense of place, and promote community cohesion for both new and existing communities.
- Addressing the needs of a multilingual city and providing opportunities to enhance and protect the Welsh language. Opportunities may include providing access to key community and educational services, good quality homes and jobs, and promotion of Welsh heritage through the preservation and restoration of key cultural areas/features.
- Supporting conservation and enhancement of historic buildings and structures for architectural and historic interest due as they are sources of pride and part of cultural identity. This includes Conservation Areas and other locally defined heritage assets aid our understanding and appreciation of place.
- Securing the conservation and enhancement of archaeological remains, and archaeologically sensitive areas, and support the undertaking of archaeological investigations.

Vision

An overarching vision is essential for a Local Development Plan. The Vision sets out a positive aspiration, which addresses the national, regional and local issues, challenges and opportunities. The emerging Vision of the Replacement LDP is:

RLDP Vision

Newport will be a destination where people will want to live, work and visit:

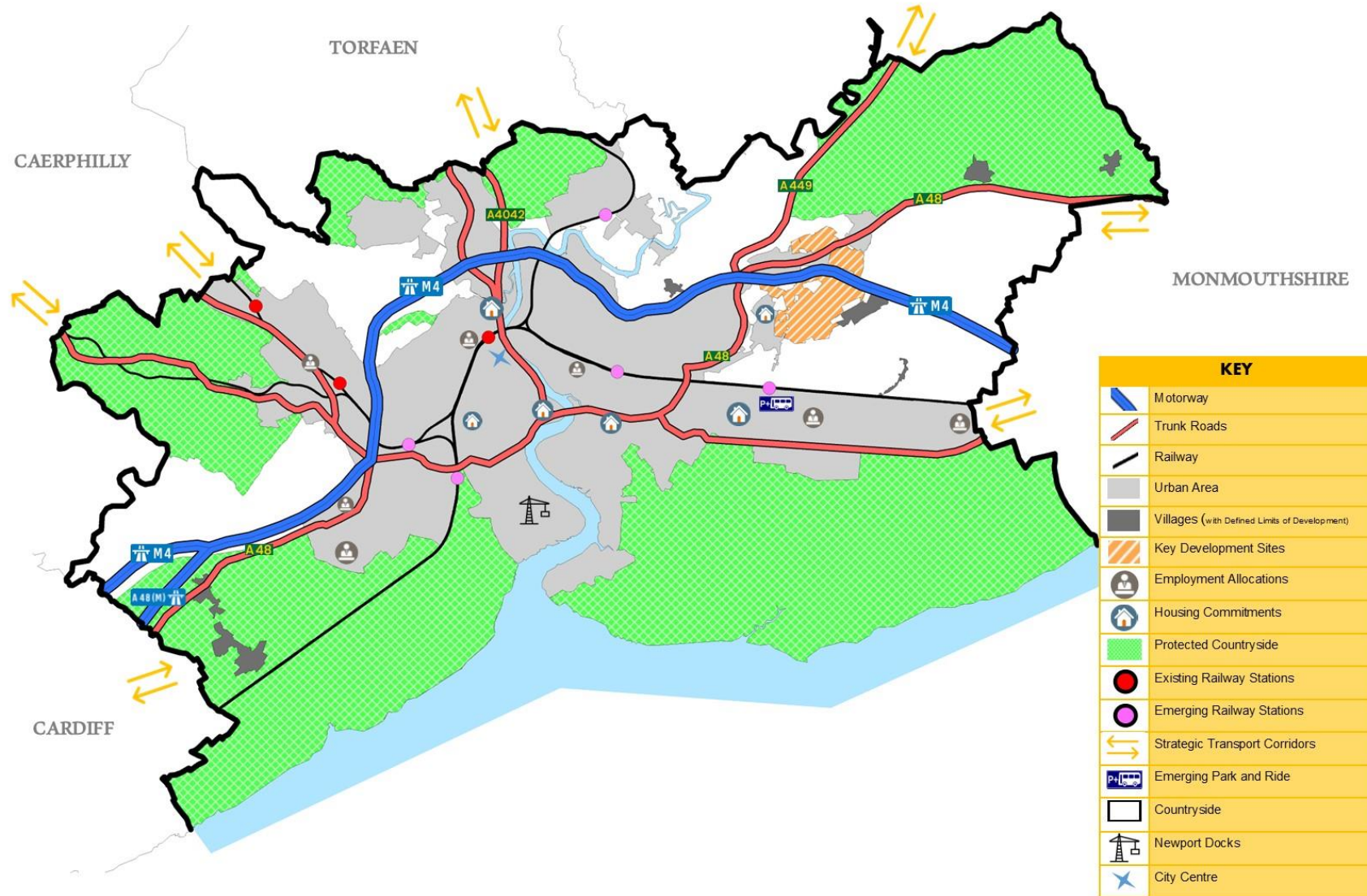
- ❖ A strategically significant City which will contribute towards the national growth of Wales.
- ❖ A City that tackles inequality through sustainable patterns of development, creating places that are safe, connected, inclusive, healthy, and well designed with access to housing, jobs, services and the natural environment.
- ❖ A City that promotes and protects its historic assets, diverse cultures and languages.
- ❖ An economically thriving City which supports and attracts business and industry at all scales, particularly where they focus on sustainable, innovative and technologically leading practices, which contribute towards cultivating a skilled and adaptable workforce.
- ❖ A resilient City which sustainably manages its natural resources, protecting and enhancing the biological and ecological values of the natural environment, including the benefits of ecosystem services, in a carbon neutral and climate responsible manner.

Objectives

The objectives underpin the Vision and are essential to achieving it through more specific and direct goals, which directly address the issues, challenges and opportunities in achieving the overarching Vision. Emerging objectives are:

1. Economy and Employment Provide for Newport's economic growth by offering a diverse range and choice of new and improved employment opportunities, which are adaptive to change and meet the needs of Newport and beyond, supporting a strong skilled and resilient workforce.		
Links to Well-being Goals: 1, 2, 4, 5, 7	Links to KPP and NSPO: 1, 2, 3, 4	Links to Issues: 1, 8, 9, 10, 11
2. Population and Communities To provide high-quality homes that meet the needs of Newport, as a national growth area, and to ensure that these homes are supported by the necessary social, environmental, cultural and physical infrastructure to provide safe and healthy places for people that maintain and enhance community and settlement identities		
Links to Well-being Goals: 1, 2, 3, 4, 5, 6	Links to KPP and NSPO: 1, 2, 3, 4	Links to Issues: 26, 27, 28, 29, 38, 39,
3. Health and Well-being To improve health and well-being through the creation of well-connected, accessible, healthy and active places, tackling health and socio-economic inequality through sustainable growth.		
Links to Well-being Goals: 1, 2, 3, 4, 5, 6	Links to KPP and NSPO: 3, 4	Links to Issues: 30, 31, 32, 33, 34, 35
4. Equality, Diversity, and Inclusion To create quality positive places where development realises the multiple benefits from the creation of inclusive, connected, adaptable and accessible communities that are cohesive and where Newport's culture, including the Welsh language, is valued and promoted.		
Links to Well-being Goals: 1, 4, 5, 6	Links to KPP and NSPO: 1, 3, 4	Links to Issues: 27, 34, 36, 37, 40, 41
5. Transport and Movement Reduce the need to travel and increase the use and provision of sustainable travel options.		
Links to Well-being Goals: 1, 3, 4, 5, 7	Links to KPP and NSPO: 1, 2, 3, 4	Links to Issues: 2, 6, 13, 31
6. Natural Resources Sustainably manage the natural resources in Newport to meet the needs of present and future communities, by ensuring resource efficiency, improved health outcomes, and the creation of a successful circular economy and green growth.		
Links to Well-being Goals: 1, 2, 3, 7	Links to KPP and NSPO: 1, 2, 5	Links to Issues: 3, 6, 14, 15, 16, 17, 18
7. Biodiversity and Geodiversity To maintain, enhance and improve the biodiversity and geodiversity of Newport and its surrounds, including improved ecological resilience, diversity, connectivity and adaptability, whilst ensuring net benefits are facilitated from development.		
Links to Well-being Goals: 2, 7	Links to KPP and NSPO: 2, 5	Links to Issues: 3, 19, 20
8. Historic Environment To preserve, enhance and realise the value of Newport's heritage resources, through investment, interpretation and maximisation of those opportunities provided by the distinctive historic environment and archaeological assets.		
Links to Well-being Goals: 5, 6, 7	Links to KPP and NSPO: 4, 5	Links to Issues: 3, 12, 42, 43
9. Landscape To protect and enhance the quality and character of Newport's landscape, townscape and seascape, and maximise the opportunities these features offer.		
Links to Well-being Goals: 2, 3, 6, 7	Links to KPP and NSPO: 2, 5	Links to Issues: 21, 22, 23, 24
10. Climate Change To ensure that development and land uses in Newport are resilient to the effects of climate change, and actively tackle the causes and impacts of climate change through minimisation, adaptation and mitigation.		
Links to Well-being Goals: 1, 2, 3, 4, 7	Links to KPP and NSPO: 1, 2, 3, 5	Links to Issues: 4, 5, 7, 9, 19, 25, 38, 39

Newport Preferred Strategy Key Diagram



Preferred Strategy

The delivery of the Vision and ten objectives required the identification of a Preferred Strategy. Key elements to this are:

- The scale of population and housing growth over the plan period.
- The scale of job and employment growth over the plan period.
- The spatial distribution/ location of new growth and strategy applied to determining where different types of development should or shouldn't go.

The emerging growth strategy for Newport over the period 2021-2026 is set out in PS1. This has been determined as the preferred growth strategy by taking account of a number of considerations, including feedback from the community and other key stakeholders.

PS1 Scale of Growth

To support Newport's vision as a destination where people want to live, work and visit, the plan will make provision for:

- ❖ 10,530 homes to deliver a housing requirement of 9,570; and
- ❖ 87.5ha of employment land to meet an employment land requirement of 77ha and minimum of 8,640 new jobs.

To provide new homes and jobs development will be delivered in a number of ways. Overarching principles of this can be summarised as:

- Maximising and prioritising opportunities to redevelop land within the urban boundary.
- Urban expansion in less constrained areas on sites of a range of sizes, adjoining the settlement boundary.
- Redevelopment and new development of an appropriate size and type in rural areas to support the vibrancy of Newport's rural communities.

PS2 sets out the delivery strategy which seeks to implement these principles.

A review of housing land supply has indicated that in delivering the requirements for housing and employment land set out in PS1, there are different ways in which development is expected to come forward. These can be summarised as:

- 5,800 new homes which have already been completed or are on sites with planning permission or existing allocations. These are predominately Previously Developed Land.
- 1,690 homes to come forward through small and large windfall sites.
- 2,850 new homes to come forward on Key Sites in Langstone and Llanwern.
- 1,830 new homes to be identified on additional sites of up to 299 within and adjoining the urban area, as well as some smaller sites of an appropriate size at defined villages.

PS2 Delivery Strategy

Urban Area

New development will predominately occur within, and adjoining, the Newport urban boundary. The urban area of Newport forms the highest tier of the settlement hierarchy and the most sustainable location for growth.

Proposals within the urban area will be considered most favourably, particularly where they contribute to:

- i) the vitality, viability and quality of the environment of the city centre;
- ii) the provision of residential and business opportunities within the urban area;
- iii) reuse of vacant, underused or derelict land;
- iv) encourage the development of community uses where appropriate.

Rural Communities

Several villages are defined outside of the urban boundary, these form the second and lowest tier of the settlement hierarchy. These are rural communities which are relatively less constrained and where good access to services and facilities has been assessed, suggesting an appropriate level of self-sufficiency. Development of an appropriate type and scale will be supported within village boundaries, including that which comprises infilling and rounding off. Development adjoining boundaries may be appropriate where local a need can be evidenced.

Defined villages are Bishton, Underwood, Parc Seymour, Christchurch, Castleton and Marshfield.

Countryside

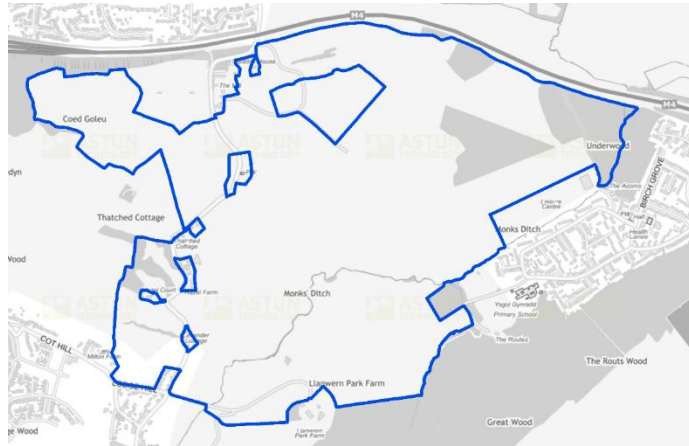
Land outside and disconnected from settlement boundaries is defined as countryside. Development will only be permitted in these locations where there is an evidenced need for such development and where it can be demonstrated that development sufficiently addresses any site specific constraints, including respecting the landscape character and biodiversity of the immediate and surrounding area. Development must also be appropriate in scale and design.

Key Sites

Three Key Sites have been identified within the urban boundary, these are supported by initial development frameworks, which will inform a collaborative masterplanning process. The assessment process is outlined within the Candidate Site Assessment Report.

KS4: Langstone Road, Llanwern, Ref CS0032

Land east and west of Langstone Road, Llanwern is identified for mixed use development for up to 2,500 homes, a district centre, public open space and a network of Green Infrastructure.



KS7: North Langstone, Ref CS0014, CS0053, CS0065

Land north of Langstone is identified for residential development for up to 750 homes and a local centre.



KS8: South Langstone, Ref CS0016, CS0040

Land south of Langstone is identified for residential development for up to 300 homes, SuDs and Green Infrastructure.



Strategic Framework

The Strategic Framework is the strategic policies which have the most importance for delivering the strategy. These will be further underpinned by more detailed policies for development management. These policies set out the strategy for addressing a range of issues.

All new developments in Newport should comprise sustainable developments, one aspect of this is the delivery of sustainable placemaking which incorporates good design principles and responds to local circumstances. To achieve this, PS3 outlines:

PS3 Sustainable Placemaking and Design

All new development proposals will be required to make a positive contribution to sustainable places to support the high-quality design, health and well-being of communities. They will be assessed as to their contribution towards the following:

- i. High quality design, which is inclusive and accessible, meeting the full needs of existing and future communities, while protecting and enhancing the built and natural environment.
- ii. A Green Infrastructure led approach, which is informed by the Council's Green Infrastructure Assessment.
- iii. The efficient use of land, which supports a mix of uses at appropriate densities.
- iv. Meeting a range of housing needs through the appropriate mix of housing types and tenures.
- v. A plot-based approach to design, providing opportunities for small plots, including custom and self-build schemes.
- vi. Supporting active travel within communities by ensuring that streets are safe, comfortable and enjoyable and that developments offer access to public transport and range of facilities within walking distance of most residents.
- vii. Prioritising access and movement by active and sustainable transport across the city, by route and system integration, reducing dependency on private vehicles for short trips.
- viii. Encouraging economic diversification and in particular improving the vitality and viability of the city centre and district centres.
- ix. Supporting and sustaining the long-term growth of the Welsh language.
- x. Avoiding unacceptable harm to health as a result of land contamination, air quality, noise, light or flooding.

Climate Change is a significant challenge at all scales and locally, it is proposed that development proposals must align with PS4 to achieve local targets set out within the Council's Climate Change Plan.

PS4 Climate Change

All development proposals must make a positive contribution towards mitigating, adapting and building resilience to the impacts of climate change. Proposals must take account of the need to:

- i. avoid development in areas assessed as being at risk of flooding and, where these locations cannot be avoided, development is to be designed in a way which minimises risks and ensures flood resilient design;
- ii. achieve low / zero carbon building development, including designing buildings in a way which minimises energy consumption and incorporates renewable, low or zero carbon energy sources, including on site energy provision;
- iii. incorporate local heat networks and low carbon heating, such as heat pumps;
- iv. adopt sustainable construction practices, including reuse or recycling of existing construction materials present on the site or using local materials;
- v. improve sustainable access through spatial design, digital connectivity and maximised sustainable travel and transport opportunities;
- vi. integrate electric vehicle charging infrastructure and Zero Emission Vehicle infrastructure onsite;
- vii. maximise Green Infrastructure opportunities as a part of nature-based solutions as a part of increasing on site resilience;
- viii. minimise, re-use and recycle waste; and
- ix. ensuring the sustainable and efficient use of energy and resources such as land, water and minerals.

A key aspect of the planning system is to support the health and well-being of existing and new communities through new development and redevelopment. Achieving this is essential to the sustainable development aims of the Well-Being of Future Generations Act 2015.

PS5 Health and Well-being

All development proposals should seek to maximise their positive contribution to health and wellbeing of existing and new communities, including the reduction of health inequalities. Negative impacts should be avoided by ensuring development is located in the most sustainable locations and supports:

- Community assets and cohesion to support wellbeing
- Transport and active travel
- Lifetime Homes Standards

New or improved infrastructure will be required to support new development meeting the needs of existing and new communities. Primarily new or improved infrastructure will be secured through Section 106 legal agreements and will have a role in avoiding any negative impacts which could arise from the development. PS6 sets out the type of infrastructure which may be provided.

PS6 Infrastructure

To support healthy and sustainable communities, all development will need to be supported by sufficient existing or new infrastructure through provision or financial contributions towards such infrastructure, where necessary. This list is not exhaustive, but the following are infrastructure priorities that developments will be expected to provide or contribute to in order to mitigate any negative consequences of development:

- educational facilities and/or their upgrades;
- affordable housing;
- improvements to the highway network, including walking and cycling routes and public transport;
- outdoor recreation;
- protection, enhancement and management of the natural, historic and built environments;
- community facilities and/or their upgrades; and
- improvements to the public realm.

The delivery of affordable housing tenancies of different types and sizes throughout new housing development is a key priority of the RLDP. PS7 sets out an overarching approach to this.

PS7 Affordable Housing

To address affordable housing needs in the City, new housing developments will incorporate or contribute to affordable housing provision, supporting a mix of housing types and tenures be delivered on or, if necessary, off-site. Affordable homes should be dispersed throughout development.

To maintain a location for investment and vibrant economy where new employment and training opportunities are available, land for employment uses is identified. PS8 sets out the employment land requirement and allocations to address this.

PS8 Employment Land Provision

87.5ha of employment land is allocated to address the requirement for 77ha of employment land, the following sites are allocated as employment land:

- i) Celtic Lakes – 38.5 hectares for B1, B2, and B8 uses;
- ii) Celtic Springs – 3 hectares primarily for B1 use;
- iii) Gwent Europark – 16 hectares for B8 distribution uses;
- iv) Land Off Chartist Drive, Rogerstone – 2 hectares for B1, B2 and B8 uses;
- v) Celtic Business Park (St Modwen Park) – 25.9 hectares for B1, B2 and B8 uses;
- vi) Godfrey Road (Rear of Station) – 2 hectares for B1 and other commercial uses;

these allocations will be protected for employment uses, and alternative uses for the sites will be resisted.

Newport City Centre is a vital element of Newport’s urban core, providing a range of retail and commercial services for all of Newport to access. The City Centre is the principal location for commercial development and will be a focal point for regeneration up to 2036 to ensure this role is supported, maintained and enhanced. PS9 sets out a hierarchy of retail and commercial centres in Newport and the types of development which is expected to be directed towards these locations.

PS9 Retail and Commercial Centres

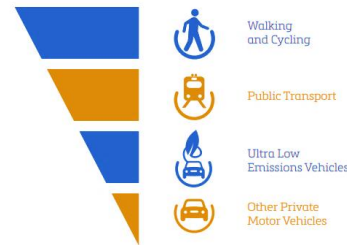
Proposals for new retail, commercial, leisure, higher education, health and public service facilities, best located in a city centre, will be subject to an assessment of need and the sequential test, where these proposals are not within the City Centre.

Development will be preferentially located according to the following hierarchy of centres:

1. Newport City Centre
2. District Centres
3. Local centres
4. Out of centre sites

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The Sustainable Transport Hierarchy is outlined within national planning policy and has a role in changing movement choices and behaviours by promoting walking and cycling and public transport. Within this hierarchy private vehicle use has less priority, with Ultra Low and Zero emission vehicles being a favoured option to other private motor use. As well as supporting national policy and



strategy objectives, PS10 has a role in aligning development with the Newport Climate Change Plan and the Local Transport Plan.

The development of the South East Wales Metro will bring forward a number of new transport projects to create additional capacity for people to use the active travel, bus and rail networks, particularly longer journeys to and from South West Wales or Bristol. A number of transport proposals are anticipated as coming forward in the short, medium and long term to support the project, while transport infrastructure will be required to support growth through new development. PS11 outlines the Council's approach to considering these proposals.

PS10 Sustainable Transport

Development must seek to be sustainable transport oriented and accord with the Sustainable Transport Hierarchy by being located and designed in a way which reduces the need to travel, promotes sustainable access to a range of services and facilities, including employment, and reduce dependency on the private car. Development will need to be supported by appropriate transport measures and infrastructure and proposals will need to:

be well located to reduce the need to travel to employment and other services and facilities;

- i. prioritise walking and cycling through the safeguarding, improvement and expansion of the existing active travel network;
- ii. ensure that street design balances network efficiency with safe and comfortable access for all users;
- iii. promote accessibility to and from new development through sustainable modes of transport;
- iv. enhance public transport opportunities, such as bus priority, safeguarding and enhancement of rail routes and identification of new railway stations;
- v. prioritise transport measures and schemes in line with regional and local transport plans;
- vi. Consider the designation of transport interchanges for park and ride, park and share, and road to rail freight centres;
- vii. provide an appropriate level of parking provision for a range of parking needs, including charging infrastructure for Zero Emission Vehicles.
- viii. utilise green infrastructure for its well being and air quality benefits in place shaping;
- ix. integrate with digital monitoring and systems for traffic and air quality management.

Transport Assessments, including Sustainable Travel Plans / Transport Implementation Strategies will be required in accordance with Technical Advice Note 18: Transport.

PS11 Transport Proposals

Transport proposals should seek to align with the Sustainable Transport Hierarchy and will be supported where they:

- i. provide infrastructure to support walking and cycling and expansion of the existing active travel network;
- ii. provide new and enhanced local and regional connections by public transport
- iii. support transition towards Zero Emissions Vehicles;
- iv. improve road safety and reduce congestion, particularly on the m4 and strategic road networks;
- v. provide access to new development areas through sustainable transport modes;
- vi. will demonstrably result in other environmental improvements, including air quality, noise reduction, sustainable drainage and enhanced biodiversity.

Flood risks, particularly those arising from the sea, are a strategic constraint in Newport. National planning policy and guidance is being reviewed and sets out a robust approach to considering flood issues through development, forming the basis for decision making. Policy PS12, builds on national policy to highlight the importance of mitigating flood risks, adapting and building resilience to flood consequences in Newport.

PS12 Flood Risk

Newport's coastal and riverside location necessitates that development be directed away from flood risk areas and must avoid increasing the risk of flood elsewhere. Development proposals will be considered on the basis of accordance with national guidance. Where appropriate, a detailed technical assessment will be required to ensure that the development is designed to cope with the threat and consequences of flooding over its lifetime. Nature-based solutions to manage flood risk should be prioritised.

Green Wedges are spatial designations which seek to protect built up areas from merging into one another. In Newport four Green Wedges are designated. PS13 outlines these and identifies their role to maintain openness.

PS13 Green Wedges

Green wedges have been identified in order to prevent coalescence between the following settlements:

- i) Newport and Cardiff;
- ii) Rogerstone and Risca;
- iii) Bettws, Malpas and Cwmbran;
- iv) Caerleon and Cwmbran.

Within these areas development which prejudices the open nature of the land will not be permitted.

An increase in size of a dwelling of more than 30% of the volume of the original size of the dwelling, or as existed in 1948, will not be approved.

PS14 Special Landscape Areas

Special landscape areas are designated as follows within which proposals will be required to contribute positively to the area through high quality design, materials and management schemes that demonstrate a clear appreciation of the area's special features:

- i) North of Bettws
- ii) West of Rhiwderin
- iii) Wentlooge Levels
- iv) River Usk
- v) Caldicot Levels
- vi) Wentwood

Green Infrastructure and biodiversity are important aspects of Newport's ecological systems. In addition to the climate emergency, Newport is facing an ecological emergency. Green Infrastructure has a number of benefits to both ecosystems and communities. PS15 provides the Council's approach to supporting and encouraging Green Infrastructure for its wide ranging benefits, including the protection of the natural environment.

The publication of Future Wales means that the designation of Green Belts by Local Development Plans is no longer appropriate, as these are a responsibility for Strategic Development Plans. The South East Wales Strategic Development Plan will need to designate a strategic Green Belt for South East Wales. The 2011-2026 LDP designates a Green Belt on the Cardiff – Newport Local Authority border and seeks to maintain separation between the urban area of Cardiff and Newport's communities. On the basis on emerging evidence, it can be assumed that the current Green Belt is in within the Area for Consideration as Green Belt, which the Strategic Development Plan will assess further. There is no certainty at this stage that area currently designated will be included in the new strategic South East Wales Green Belt and further consideration will be given to whether a Green Wedge designation is appropriate to protect the openness of this area.

Special Landscape Areas are apparent around the built form of Newport and have been designated to protect their special characteristics. PS14 outlines these designations and the approach to be taken to managing development proposals in these. Further evidence may inform a change to the boundaries of these.

PS15 Green Infrastructure and Biodiversity

Development will protect and enhance Newport's green infrastructure and biodiversity assets to ensure the integrity and connectivity of this multi-functional resource is maintained and strengthened and positively managed.

Green infrastructure is key to Newport's character, distinctiveness and sense of place, and can include:

- Parks, playing fields, green play areas and open spaces
- Trees (including street trees), woodlands, hedgerows, soils and landscaping
- Strategic recreational routes, cycleways, active travel and the public rights of way network
- Sustainable drainage systems
- Growing spaces including allotments, community orchards and larger public and private gardens
- Undeveloped countryside and coastline
- Landscape, geological and heritage features which contribute to the City's setting
- Strategically important river valleys of the Usk and the Ebbw
- Biodiversity interests including designated sites and the connectivity of priority habitats and species
- Roadside verges, roundabout islands and screen planting along roads.

Protection and conservation of green infrastructure needs to be reconciled with the benefits of development. Proposed development should therefore demonstrate how green infrastructure has been considered and integrated into a placemaking approach; that there is a Net Benefits for Biodiversity; and how the resilience of ecosystems can be maintained. If development results in loss of diversity, extent, connectivity and condition of green infrastructure, appropriate compensation will be required.

Potential conflicts between different elements of green infrastructure should be reconciled as part of any development, and where appropriate, a Green Infrastructure Statement should set out how the layout and design of the scheme will contribute to, or be compatible with, any published local or regional Green Infrastructure Strategy.

Newport has a rich and attractive historic environment, which contributes to local culture and local identity. PS16 sets out the approach to managing both listed and non-listed assets.

PS16 Conservation of the Historic Environment

All proposals will need to ensure the protection, conservation and/or enhancement of Newport's rich historic environment, including listed and non-listed assets.

One way of addressing the climate emergency is to transition to generating energy from cleaner sources. Newport has very good potential to support new energy generation from solar technologies. All new buildings are to incorporate solar panels as a part of low carbon design. Local Search Areas for ground mounted solar have been identified, these are broad locations where ground mounted solar has been assessed as being more feasible. It is expected that these types of proposals will be directed towards these locations to positively contribute addressing local energy needs. PS17 provides the approach to managing proposals for these.

PS17 Renewable Energy

Renewable and low carbon energy schemes will be supported. Proposals for renewable energy generating development will be subject to all of the following criteria:

- i. there would be no over-riding environmental, including on designated ecological sites;
- ii. there would be no unacceptable impact on amenity; and
- iii. there would be no unacceptable cumulative impacts in combination with existing or consented development.

Within the Local Search Areas, as shown on the Proposals Map, proposals for ground mounted solar energy generation will be permitted or supported subject to the above criteria. Proposals for other development within these areas will only be permitted where it is demonstrated that the renewable energy potential of the Local Search Area would not be undermined.

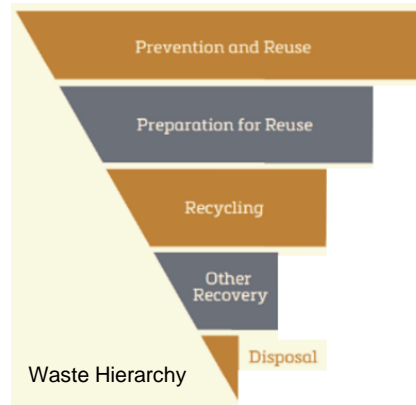
Minerals are an essential and limited resource in Newport. Working and winning minerals to meet demands in Newport tend to occur outside of the authority due to the nature of demands. Mineral extraction has a cross boundary relationship as a result. PS18 seeks to positively contribute to regional minerals working.

PS18 Minerals

The plan will sustainably contribute towards meeting regional demand for mineral resources by:

- i. Promoting the appropriate use of secondary and recycled aggregates;
- ii. Safeguarding hard rock and sand and gravel resources from development which may preclude its potential future extraction;
- iii. Safeguarding existing and potential wharves and rail infrastructure at Newport Docks for the sustainable transportation of aggregate;
- iv. Supporting proposals for the winning and working of minerals in the regional context, whilst having appropriate regard to local constraints.

Sustainable management of waste relates to managing waste produced in Newport in accordance with the hierarchy. This means reducing waste at the source. This is prevention. Supporting the reuse, ahead of recycling materials. Burning them for energy or other types of recovery and then sending them to landfill are last resorts.



PS19 Waste Management

To delivery sustainable waste management in Newport, Waste will be managed in the following ways:

- i. Supporting waste prevention, reuse and the provision of facilities that use recycled or composted products
- ii. Promoting and supporting additional sustainable waste management facilities in a manner that follows the waste hierarchy and the principles of an integrated and adequate network of waste installations; nearest appropriate installation; self-sufficiency and protection of human health and the environment;
- iii. Supporting the provision and maintenance of sustainable waste management storage and collection arrangements in all appropriate new developments.

Review of Development Management Policies

The 2011-2026 LDP sets out a range of policies for development management. These will be reviewed to reflect changes to the strategy and overarching strategic policies, responding to contextual changes and local challenges. The following table details the proposed changes, building on the review report.

General Policies		Commentary	Recommendation
GP1	Climate Change	Revision necessary to reflect spatial strategy over the extended period and to align with the Newport Climate Strategy. Opportunity to promote the policy to a strategic policy, reflecting the importance of the climate emergency.	Updated with amendments and promote the policy. Draft policy forms part of the Preferred Strategy.
GP2	General Amenity	Functioning effectively.	Carry forward with minimal changes.
GP3	Service Infrastructure	Functioning effectively.	Carry forward with minimal changes.
GP4	Highways and Accessibility	Amendments required to consider Active Travel and transport hierarchy.	Update required to reflect the transport strategy.
GP5	Natural Environment	Amendments to include signposting to enhancement requirements, Bee Friendly City status, outcome of HRA and ISA.	Update to strengthen policy, reflect changes to national planning policy, outcomes of environmental assessments and strategic policy changes.
GP6	Quality of Design	Amendments required to clearer define "Good Design," and opportunity to stress the importance of placemaking.	Update required to align policy with the strategic policy for Sustainable Placemaking and Good Design and to provide clarity to support implementation.
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.	Delete, overarching policy matters to be addressed through strategic policy for sustainable placemaking and matters to be split and addressed through individual detailed policies for air quality, land contamination, overheating and noise and any other environmental health issues.
Environment Policies		Commentary	Recommendation

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CE1	Routeways, Corridors and Gateways	Functioning effectively	Update to more clearly link to green infrastructure and greening of main roads and transport corridors.
CE2	Waterfront Development	Functioning effectively	Carry forward with minor amendments
CE3	Environmental Spaces and Corridors	Functioning effectively	Carry forward with minor amendments
CE4	Historic Landscapes, Parks, Gardens and Battlefields	Functioning effectively	Carry forward with minor amendments
CE5	Locally Listed Buildings and Sites	Review whether a local list is to be produced	Update to be linked to a new local list.
CE6	Archaeology	Functioning effectively	Carry forward with minor amendments
CE7	Conservation Areas	Functioning effectively	Carry forward with minor amendments
CE8	Locally Designated Nature Conservation and Geological Sites	Functioning effectively	Carry forward with minor amendments
CE9	Coastal Zone	Revisions needed to reflect Technical Advice Note 15, National Marine Plan, Shoreline Management Plan 2 and Newport Flood Risk Management.	Update with amendments to reflect changes to national and local context.
CE10	Renewable Energy	Revision necessary to reflect government and local targets, with the policy text updated to be more in line with national policy. Opportunity to promote to strategic policy as a result of incorporation of targets.	Update to reflect changes to national policy, recommendations made by the evidence base and the Newport Local Area Energy Plan. Draft policy forms part of the Preferred Strategy.
SP5	Water Resources	Functioning effectively, but there is an opportunity to consider demoting the policy or incorporating it with the strategic climate change policy.	Update to reflect the role of the policy in decision taking and possible integration with climate policy.
New	Low Carbon Building		Further consideration to be given to a low carbon building policy.

New	District Heat Networks		Further consideration to be given to a district heat network policy.
Housing Policies		Commentary	Recommendation
H1	Housing Sites	Revision necessary – revised level of housing growth over new plan period in relation to housing requirement and spatial strategy.	Update to outline housing site allocations.
H2	Housing Standards	Review whether the policy can further reflect updates in design and lifetime development needs.	Updates to wording to reflect latest changes to national policy, standards and guidance.
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	Update required to indicate targets for different housing types and tenures, if necessary, and to reflect higher density ambitions. Changes will be made in line with the emerging Local Housing Market Assessment.
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.	Update to targets as informed by the emerging Local Housing Market Assessment.
H5	Affordable Housing Exceptions	Revision necessary – required greater clarification on what is local need.	Update to be informed by Local Housing Market Assessment and consideration of what is required to demonstrate local need.
H6	Sub-division of Curtilages, Infill and Backland Development	Functioning effectively	Carry forward with only minor amendments where necessary.
H7	Annexes to Residential Dwellings	Functioning effectively	Carry forward with only minor amendments where necessary.
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.	Update needed and will be informed by the Housing in Multiple Occupation Research Report.

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H9	Housing Estate Regeneration	Update in line with successful delivery of Alway, Ringland and Pillgwenly Regeneration schemes. Identify specific allocations if required.	Update to reflect progress and consider allocations in line with an understanding of any estate regeneration strategies.
H10	Conversions in the Countryside	Functioning effectively	Carry forward with only minor amendments where necessary.
H11	Outbuildings and Extensions to Conversions	Functioning effectively	Carry forward with only minor amendments where necessary.
H12	Replacement Dwellings in the Countryside	Functioning effectively	Carry forward with only minor amendments where necessary.
H13	Extensions to Dwellings in the Countryside	Functioning effectively	Carry forward with only minor amendments where necessary.
H14	Caravans	Functioning effectively	Carry forward with only minor amendments where necessary.
H15	Gypsy and Traveller Transit Accommodation	Revision Necessary – to reflect updated needs assessment.	Update to reflect GTAA 2021 and regional transit needs evidence base.
H16	Gypsy and Traveller Residential Accommodation	Revision Necessary – to reflect updated needs assessment.	Update to reflect GTAA 2021.
H17	Gypsy and Traveller Accommodation Proposals	Functioning effectively	Update to reflect GTAA 2021.
New	One Planet Development		Further consideration to be given to a locally specific One Planet Development policy.
New	Self and Custom Build		Further consideration to be given to a self and custom build policy.
New?	Tourism Accommodation		Further consideration to be given to a policy directly related to proposals falling in to Use Classes C5 and C6.
Employment Policies		Commentary	Recommendation
EM1	Employment Land Allocations	Revision Necessary. Policy to be informed by the recommendations of the Employment Land Review 2022.	Updated to reflect recommendations made by the evidence base and in line with the strategic policy for employment land. There is potential to split the policy to provide site allocation policies for those proposals where

			certainty of delivery is needed and constraints need to be addressed.
EM2	Newport Docks	Functioning effectively	Carry forward with potential minor amendments to reflect most up to date proposals.
EM3	Alternative uses of Employment Land	Revision Necessary - Revision Necessary. Policy to be informed by the recommendations of the Employment Land Review 2022. Revisions will reflect growth strategy; impacts of Covid-19; marketing requirements; definition of commercial leisure development; and restrictions on Change of Use of recently developed employment land.	Updated to reflect recommendations made by the evidence base and to address issues with implementation.
New	Rural Diversification		Further consideration to be given to a policy to support and control the rural economy, rural enterprises and rural diversification.
Transport Policies		Commentary	Recommendation
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.	Deleted to reflect changing priorities away from major road building and towards increasing capacity of other modes of movement and travel in line with the Transport Hierarchy.
T1	Railways	Functioning effectively	Update to reflect changing priorities for both local and strategic rail programmes and projects.
T2	Heavy Commercial Vehicle Movements	Functioning effectively	Carry forward with some changes needed to reflect the wider transport strategy.

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T3	Road Hierarchy	Functioning effectively	Carry forward with any necessary changes to reflect wider approach to traffic management.
T4	Parking	Revision required – to reflect national policy requirements, consider boundaries of parking zones and ULEV charging implications.	Update to widen scope to address a range of parking needs, including ULEV and cycle parking within policy.
T5	Walking and Cycling	Functioning effectively	Update to identify and safeguard active travel routes and network maps.
T6	Public Rights of Way Improvement	Functioning effectively	Carry forward with minor changes where necessary.
T7	Public Rights of Way and New Development	Functioning effectively	Ca Carry forward with minor changes where necessary.
T8	All Wales Coast Path	Should this be combined with Policy T7?	Deleted to be merged with policy T7.
Retailing and the City Centre Policies		Commentary	Recommendation
R1	City Centre Schemes	Revision necessary to all City Centre Retail Policies. Changes are required to reflect the changing way in which people use Newport City Centre and to address challenges, such as vacancy rates, falling footfall and pressures of out of town retail.	Update with amendments to reflect recommendations of the evidence base, and City Centre Masterplan and the emerging City Centre placemaking plan.
R2	Primary Shopping Frontage		Update required to reflect the changing spatial aspect of the Primary Shopping Area and to ensure the policy isn't overly restrictive to change.
R3	Non-Retail Uses in Secondary City Centre Shopping Areas		Update required to reflect the changing spatial aspect of the Primary Shopping Area and to ensure the policy isn't overly restrictive to change.
R4	Non-Retail Uses in Other City Centre Shopping Areas		Update to define complementary uses and commercial leisure development in line with national policy.
R5	Café Quarter		Deleted. Policy assessed by Retail and Leisure Study 2019 as having limited efficacy. Evidence proposes supporting food and beverage leisure elsewhere in the City.

R6	Retail Proposals in District Centres	Revisions to respond to health of defined centres and provide clarity relating to application of tests, in line with strategic policy.	Update to reflect strategic policy and the retail strategy.
R7	Non-Retail Uses in District Centres		Update to reflect strategic policy and the retail strategy.
R8	Small Scale Retail Proposals	Revisions to provide clarity relating to the application of policies and the management of proposals outside of the urban boundary.	Update to provide clarity on how the policy will be applied.
R9	Change of Use to Non-Retail Uses Inside Local Centres		Update to provide clarity on how the policy will be applied.
R10	New Out of Centre Retail Sites	Revision necessary to all Out of Center Retail Polices. Pressures of out of town retail on the vitality and viability of the City Centre remain apparent. Policies to be reviewed to ensure this pressure is managed and seek to address a wider range of uses in line with the retail strategy.	Update to reflect strategic policy and the retail strategy.
R11	Development of Existing Out-of-Centre Retail Sites		Update to reflect strategic policy and the retail strategy.
New	City Centre Housing Mix		Further consideration to be given to a City Centre housing mix policy to overcome an identified concentration of affordable housing of smaller housing types in the City Centre area. Any policy will be informed by the emerging Local Housing Market Assessment and the Housing Supply Review 2022.
New	Takeaways		Further consideration to be given to a policy addressing the location of food takeaways and promote the consideration of health impacts as a part of relevant proposals.
Community Facilities & Other Infrastructure Policies		Commentary	Recommendation
CF1	Protection of Playing Fields, Land and Buildings Used for Leisure, Sport,	Functioning effectively	Update to reflect outcomes of an Open Space Assessment and any new standards set out by Fields in Trust.

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	Recreation and Play		
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	Delete and merge with infrastructure and planning obligations policy.
CF3	Water Based Recreation	Functioning effectively	Carry forward with minor changes to incorporate requirements regarding lifeboats and leisure access.
CF4	Riverfront Access	Functioning effectively	Carry forward with minor changes to incorporate placemaking.
CF5	Usk and Sirhowy Valley Walks	Update to ensure this covers the requirement of PROW strategy	Carry forward with minor changes to incorporate other walks and placemaking.
CF6	Allotments	Functioning effectively	Carry forward
CF7	Horse Related Developments	Functioning effectively	Carry forward
CF8	Tourism	Amendments required to consider what is defined as tourism, very permissive at present possible implications from temporary accommodation from housing stock.	Update is needed to more clearly define the scope of the policy to exclude development falling into Use Classes C5 and C6.
CF9	Celtic Manor	Is a specify policy still necessary, can this be incorporated into CF8?	Delete and merge with Policy CF8.
CF10	Commercial Leisure Developments	Amendments required to consider what is defined as commercial leisure developments	Update to ensure cross over with retail and commercial policies is minimised or potential to delete if found to be sufficiently address through the changes to the retail and commercial policies.
CF11	Outdoor Leisure Developments	Functioning effectively	Carry forward.
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.	Updates to clarify wording of policy and supporting text.

CF13	School Sites	Revisions will be necessary to reflect the proposed strategy.	Updates to reflect school provision required to address the strategy.
New	Utilities/ Electricity Infrastructure		Further consideration to be given to a policy directed towards addressing utilities infrastructure, specifically linked to overcoming grid capacity issues.
New	Digital Infrastructure		Consideration to be given to a policy to support the development and enhancement of digital infrastructure in line with Future Wales.
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.	Policy to be retained with clarification provided in wording. Policy to be demoted to a Development Management policy, supporting the delivery of wider infrastructure objectives in line with PS6.
Minerals Policies		Commentary	Recommendation
M1	Safeguarding of Mineral Resource	Revision Necessary – AMR highlighted that further training is needed every year. Review whether category 2 minerals should be safeguarded.	Update required to provide clarity regarding implementation of policy.
M2	Mineral Development	Functioning effectively	Carry forward
M3	Oil and Gas	Question whether this policy goes beyond national policy	Consideration to be given to deleting this policy.
M4	Wharves and Rail	Functioning effectively	Carry forward
Waste Policies		Commentary	Recommendation
W1	Sites for Waste Management Facilities	Review to ensure adequate land supply to meet requirements of PPW.	Update to bring policy wording up to date and reflect most recent legislative, local and policy contextual changes.
W2	Waste Management Proposals	Review to ensure adequate land supply to meet local requirements.	Update to bring policy wording up to date and reflect most recent legislative, local and policy contextual changes.
W3	Provision for Waste Management Facilities in Development	Functioning effectively	Carry forward

Consultation Plan

The relevant regulations for consultation are Regulations 15 and 16 of The Town and Country Planning (Local Development Plan) (Wales) Regulations 2005 (as amended). These require:

- Consultation to be undertaken for a minimum of 6 weeks.
- Consultation documents to be made available at the Council's principal office and any other locations considered appropriate by the Council.
- Publication of the proposal documents (Preferred Strategy Consultation Paper)
- Publication of required documentation: Candidate Sites Register, details of consultation arrangements, information on how to respond, response forms, supporting technical evidence and background papers, Initial Integrated Sustainability Appraisal Report and Habitats Regulations Assessment Screening Report. Those required include the [Delivery Agreement/Community Involvement Scheme](#) and [Review Report](#) have been published and are available on the Council's website as a part of previous stages.
- Publication of a statement of fact that the pre-deposit (Preferred Strategy) documents are available for inspection and the places and time they can be viewed.
- Notify Specific and General Consultation Bodies of the Preferred Strategy consultation document, supporting documents, matters, and the statement of fact that the pre-deposit (Preferred Strategy) documents are available for inspection and the places and time they can be viewed.
- Representations to be made within the defined period.
- Sent to the Council by email (via LDP.Consultation@Newport.gov) or by post to Planning Policy, Newport City Council, Civic Centre, Newport, NP20 4UR.

Timeline:

It is proposed that the consultation is undertaken for 8 weeks from 25th October to 20th December 2023.

Publication of Documents:

It is proposed that documents will be published on the Council's website on the 25th October 2023 along with all supporting information. The notice of consultation and other procedural documents such as comment forms and guidance for submitting representations will also be published. From this date, all of these documents will be available in print from Newport Civic Centre (by appointment) and Newport Central Library. Documents will be made available in both English and Welsh.

Awareness Raising:

A similar approach will be taken to raising awareness of the Preferred Strategy consultation as was undertaken for the Vision, Issues and Objectives and the Growth and Spatial Options consultations. This approach is consistent with the [Community Involvement Scheme](#) and includes:

- An advert in Newport Matters.
- Directly contacting a range of groups representing different sections of interest parties and Newport's population¹.

¹ These are outlined in the [Delivery Agreement](#).

- A [dedicated website](#), updated at each stage of consultation.
- Advertisement on the home page of the Newport City Council website and on appropriate Council information screens.
- A consultation specific email signature banner for Newport City Council employees.
- Promotion via the Council's social media accounts, including the use of animations.
- Presentations to the Council's partnership groups and networks.
- Virtual and face to face engagement sessions. These have previously been held in person at Caerleon, Ringland, Rhiwderin and Pill.
- Additional face to face events with Community Councils, residents and environmental groups as requested.
- Weekly drop in sessions at the Civic Centre.
- Print versions sent as requested (these may be at the cost of the requestor, in line with Welsh Government guidance).
- Final documents formatted in an accessibility friendly and attractive way.

There are some approaches which have a cost where value for money will need to be considered, these are:

- Adverts on local radio or newspaper websites.
- Pop up stalls in the City Centre and community spaces.

Members of the public will also be able to contact officers by email and phone through the Contact Centre.



Report

Cabinet

Part 1

Date: 13 September 2023

Subject Quarter 1 2023/24 Corporate Risk Register Update

Purpose To present the Council's Corporate Risk Register for the end of Quarter 1 (1st April 2023 to 30th June 2023).

Author Head of People, Policy and Transformation

Ward All

Summary The Council's Corporate Risk Register monitors those risks that may prevent the Council from achieving its strategic priorities or delivering services to its communities and service users in Newport.

At the end of Quarter 1, there were 15 risks recorded in the Corporate Risk Register that are considered to have a significant impact on the achievement of the Council's objectives and legal obligations.

Overall, there are 9 Severe risks (risk scores 15 to 25); 6 Major risks (risk scores 7 to 14); that are outlined in the report. In comparison to the Quarter 4 corporate risk register, there was no change to the risk scores. One risk (Failure to achieve the completion of the annual Internal Audit plan) was escalated from the Finance service area risk register.

As set out in the Council's Risk Management Policy, Cabinet reviews the Corporate Risk Register on a quarterly basis ensuring procedures are in place to monitor the management of significant risks. The Register is likely to change following the approval of the new Corporate Plan and priorities for service delivery.

Proposal Cabinet is asked to consider the contents of the quarter one update of the Corporate Risk Register.

Action by Executive Board and Heads of Service

Timetable Immediate

This report was prepared after consultation with:

- Executive Board
- Corporate Management Team

Signed

Background

The Well-being of Future Generations (Wales) Act 2015 requires Newport City Council to set Well-being Objectives in its Corporate Plan. As a public body, the Council is also responsible for delivering services (statutory and non-statutory) to residents, businesses, and visitors across Newport. We will inherently encounter opportunities and risks that may prevent, disrupt, impact or enhance the delivery of the Council services and achieve the objectives in the Corporate Plan. How the Council responds and manages these opportunities and risks is important to ensure resources are being used efficiently and effectively to maximise value for money and to minimise and/or prevent the risk impacting services, communities, and citizens in Newport.

The Council's Risk Management Policy provides an overview of the Council's approach and its appetite for managing opportunities and risk. To provide assurance on the Council's Risk Management approach, the Corporate Risk Register provides assurance on the most significant risks that the Council was managing in the last quarter.

Officers across the Council regularly manage risk in the course of their duties whether this is health and safety risks, civil contingencies, safeguarding risks to children, young people, adults and carers or risks to assets, buildings, and Council employees. The relevant service area(s) and professional disciplines will be assessing and managing these risks as required and reporting these through their own reporting mechanisms.

In accordance with the Council's Risk Management Policy, any new, escalated / de-escalated, and closed risks in the Corporate Risk Register are reviewed by the senior management team.

Newport City Council – Quarter 1 Service Area Risk Summary

Appendix 2 of the report provides an overview of the Council's overall risks reported at the end of Quarter 1. This includes corporate and service area risks across the Council's service areas. In summary, the Council had 43 risks of which:

Total Risks at Quarter 1	Risk Scores Increased since Q4	Risk Scores Decreased since Q4	No Change since Q4	New Risks Since Q4	Closed Risks Since Q4	Escalated Risks ¹	De-escalated Risks ²
43	1	1	41	0	2	1	0

Newport City Council Quarter 1 Corporate Risk Register Summary

At the end of Quarter 1, the Council's Corporate Risk Register included 15 of the 45 risks that are considered to pose the most risk to the delivery of Council services and achievement of its strategic priorities. The 15 Corporate Risks consisted of:

- 9 Severe risks (15 to 25)
- 6 Major Risks (7 to 14)

In comparison to the Quarter 4 corporate risk register there was no change to the risk scores. One risk was escalated from the Finance service area risk register (Failure to achieve completion of the annual Internal Audit plan). See table below.

Risk	Risk Summary	Q1 Risk Score	Target Risk Score	Summary
<u>Risk Escalated</u> Failure to achieve completion of the annual Internal Audit Plan	The Internal Audit plan comprises of opinion and non-opinion audit jobs based on the number of audit days available. If not enough opinion related jobs are completed (to draft report stage) by the end of the	16	6	In the last quarter the Internal Audit team has seen 4 experienced officers leaving the team and the acting Chief Internal Auditor will be leaving the authority in September leaving 1 full time equivalent (FTEs) in post for an establishment of 6.5 FTEs. In response the Council is commencing a recruitment campaign to

Risk	Risk Summary	Q1 Risk Score	Target Risk Score	Summary
Transformation & Corporate Directorate / Finance Services	financial year this could impact on the Chief Internal Auditor's ability to provide an overall opinion on the adequacy of internal control environment, governance arrangements and risk management processes operated within the Council.			<p>appoint into the vacancies and is using external audit resource to deliver 130 planned days of work (circa 10/11 opinion related audits). The Council will also be exploring longer term options for the service.</p> <p>As at the end of Quarter 1 it will not be possible for the Internal Audit team to achieve the completion of the original Internal Audit Plan for the full year as regards 'opinion related' audits and some non-opinion work will stop / be reduced to provide focus on the opinion related work. It is predicted that of the 45 opinion related audits in the approved plan – completion could be about 24 – 34 dependent on recruitment. The team over last 6 years have completed between 30-35 opinion related audits and therefore the risk here is that we are unable to recruit resulting in completion of the lower figure of the above range. If that was the case, the service will only be able to provide limited assurance on the effectiveness of the Council's internal control, governance and risk management arrangements at best.</p>

Appendix 1 - Quarter 1 Corporate Risk Heat Map and Risk Profile

Appendix 2 – Quarter 1 Newport City Council's Service Area Risk Summary.

Appendix 3 – Newport City Council's Quarter 1 Corporate Risk Register (Attached separately).

Glossary – Risk Management terminology and Risk Score Assessment

Risks

Risk Title / Description	Risk Impact score of Risk if it occurs* (H/M/L)	Risk Probability of risk occurring (H/M/L)	Risk Mitigation Action(s) What is the Council doing or what has it done to avoid the risk or reduce its effect?	Risk Owner Officer(s) responsible for dealing with the risk?
The Council does not achieve its objectives as corporate level risks are not adequately managed and monitored.	M	L	<p>Risk Management Strategy has been adopted and mechanisms are in place to identify, manage and escalate emerging and new risks / mitigation strategies.</p> <p>Audit Committee oversight of risk management process.</p>	Directors, Heads of Service and Performance Team

* Taking account of proposed mitigation measures

Links to Council Policies and Priorities

Corporate Plan 2022-27

Service Plans 2022-24

Options Available and considered.

1. To consider the contents of the Corporate Risk Register and to continue monitoring progress of actions taken to address the risks identified in the report.
2. To request further information or reject the contents of the risk register

Preferred Option and Why

To consider the contents of the Corporate Risk Register and monitor the progress of actions taken to address the risks identified in the report. This will give the Cabinet sufficient assurance and oversight of the main overarching risks that the council faces in delivering the objectives of the Corporate Plan.

Comments of Chief Financial Officer

There are no direct financial implications arising from this report itself. The corporate risk register forms an important part of the governance and budget setting arrangements for the Council and the risk register is used to guide the internal audit plan.

There are a number of risks with either a direct or indirect financial impact. For example, the risk around balancing the medium-term financial position is currently rated as severe, due to the high inflationary environment and increasing demand for services. Whilst a balanced budget for 2023/24 was achieved, the challenge of achieving that over the medium term remains, with further difficult decisions being required to do that. There also remains a risk, as captured within the service risks, that overspends could arise during the year and close financial monitoring will be required in relation to this.

On an interim basis, the Internal Audit service is predominantly being provided/managed via an external consultancy service. An assessment of the volume of opinion work, and internal control reassurance has been undertaken and confirms the potential, on the worst case scenario, of a significant reduction in the completion of opinion related audits though the best case scenario which is dependent on successful recruitment, could achieve a smaller, less impactful reduction. The current 'major risk' assessment will be updated as necessary after the recruitment process.

As well as risks specific to Finance, close attention will also need to be paid to risks within services such as Children's Services and schools, as they have the potential to result in additional financial pressure and the need to take action in order to ensure that services remain within the budgets that they have available both in 2023/24 and over the medium term. Any unmanageable impacts may need to be reflected within the Medium Term Financial Plan as an additional pressure, adding to the existing budget gap in the process.

Comments of Monitoring Officer

There are no specific legal issues arising from the report. As part of the Council's Risk Management Strategy, the corporate risk register identifies those high-level risks that could impact upon the Council's ability to deliver its corporate plan objectives and essential public services. Governance & Audit Committee are responsible for reviewing and assessing the Council's risk management, internal control and corporate governance arrangements. However, the identification of corporate risks within the risk register and monitoring the effectiveness of the mitigation measures are matters for Cabinet. The report confirms that there have been no significant changes in the risk profile during the first quarter of this financial year, as compared with the final quarter of last year. In comparison to quarter 4, all risks scores have remained the same with one risk having been escalated to the corporate risk register from the finance area.

Comments of Head of People, Policy and Transformation

Effective monitoring and reporting against the Council's Corporate Risk Register is essential in minimising and preventing the likelihood and impact of risks against our objectives. The Council's risk management is a key area in the implementation of the Well-being of Future Generations Act (Wales) 2015.

The recent changes made to our risk management processes and system will ensure officers at all levels of the organisation have greater control and oversight of their risks taking the necessary action to mitigate their impact and escalate where necessary to senior management.

The Council's HR team continue to support with issues such as recruitment.

Comments of Cabinet Member

The Chair of Cabinet is consulted on the corporate risk register and has agreed that this report goes forward to Cabinet for consideration.

Local issues

None.

Governance and Audit Committee (GAC)

GAC received the quarter four risk report in July 2023. The committee welcomed improvements to the report presented.

Fairness and Equality Impact Assessment:

For this report, a full Fairness and Equality Impact Assessment has not been undertaken. This is because this report is not seeking any strategic decisions or policy changes, with its purpose being to update Cabinet on the current risk register.

Wellbeing of Future Generation (Wales) Act

Under the Well-being of Future Generations Act (Wales) 2015 and its 5 ways of working principles this report supports:

Long Term – Having effective risk management arrangements will ensure that the opportunities and risks that will emerge consider the long-term impact on service users and communities.

Preventative – Identifying opportunities and risks will ensure the Council is able to implement necessary mitigations to prevent or minimise their impact on Council services and service users.

Collaborative – The management of risk is undertaken throughout the Council and officers collaborate within service areas, Corporate Management Team and the Council's Cabinet to ensure decisions are made in a timely manner and are evidence based.

Involvement – The Council's Risk Management process involves officers across the Council's service areas and Cabinet Members.

Integration – Risk Management is being integrated throughout the Council and supports the integrated Planning, Performance and Risk Management Framework. The Framework ensures that planning activities consider the opportunities and risks to their implementation and overall supports the delivery of the Council's Corporate Plan and legislative duties.

Consultation

As above, the Risk Register is also considered by Audit Committee.

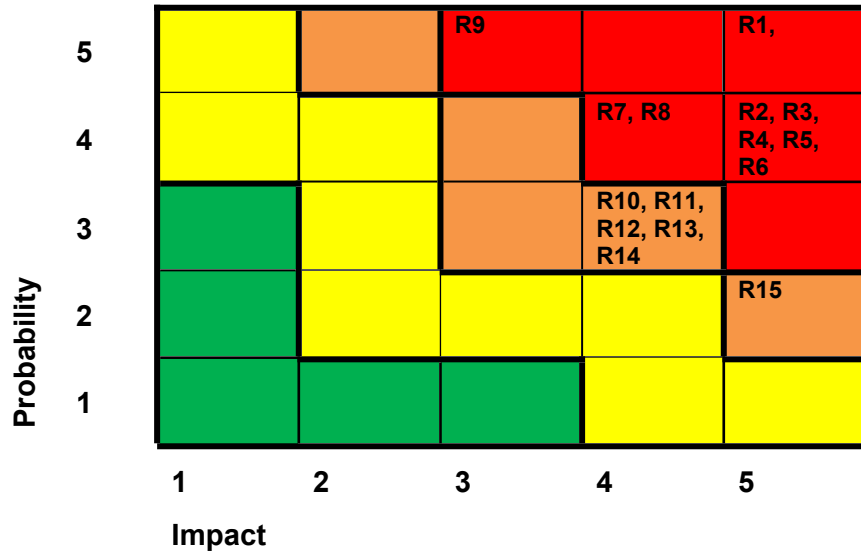
Background Papers

[Quarter 4 Corporate Risk Report \(July 2023\)](#)

Risk Management Policy 2020-22

Dated: 4 September 2023

Appendix 1 – Quarter 1 2023/24 Risk Heat Map



Corporate Risk Heat Map Key (Quarter 1 2023/24)	
R1 - Pressure on the delivery of Children Services	R9 - Eliminate Profit from Social Care
R2 - Stability of Social Services Providers	R10 - Cyber Security
R3 - Pressure on Adult & Community Services	R11 - Schools Finance / Cost Pressures
R4 - Balancing the Council's Medium-Term budget	R12 - Demand for ALN and SEN support
R5 - Highways Network	R13 - Educational Out of County Placements
R6 - Pressure on Housing and Homelessness Service	R14 - Welsh Government's Net Carbon Zero Target by 2030
R7 - Newport Council's Property Estate	R15 - City Centre Security and Safety
R8 - Failure to achieve completion of the annual Internal Audit Plan	

Risk Score Profile between Quarter 2 2022/23 and Quarter 1 2023/24

Risk Reference	Risk	Lead Cabinet Member(s)	Lead Directorate / Service Area	Risk Score Q2 2022/23	Risk Score Q3 2022/23	Risk Score Q4 2022/23	(Current) Risk Score Q1 2023/24	Target Risk Score
R1	Pressure on the delivery of Children Services	Cabinet Members for Social Services	Social Services / Children Services	25	25	25	25	12
R2	Stability of Social Services Providers	Cabinet Members for Social Services	Social Services / Adult Services	25	25	20	20	12
R3	Pressure on Adult & Community Services	Cabinet Members for Social Services	Social Services / Adult Services	25	25	20	20	12
R4	Balancing the Council's Medium-Term budget	Leader of the Council / Cabinet	Transformation & Corporate / Finance	20	20	20	20	10
R5	Highways Network / Infrastructure	Cabinet Member for Infrastructure & Assets	Environment & Sustainability / Infrastructure	20	20	20	20	15
R6	Pressure on Housing and Homelessness Service	Cabinet Member for Strategic Planning, Regulation & Housing	Environment & Sustainability / Housing & Communities	20	20	20	20	12
R7	Newport Council's Property Estate	Cabinet Member for Infrastructure & Assets	Transformation & Corporate / People, Policy & Transformation	16	16	16	16	12
R8	(Escalated) Failure to achieve completion of the annual Internal Audit Plan	Leader of the Council	Transformation & Corporate / Finance	-	9	12	16	6
R9	Eliminate Profit from Social Care	Cabinet Members for Social Services	Social Services / Children Services	-	15	15	15	4

Risk Reference	Risk	Lead Cabinet Member(s)	Lead Directorate / Service Area	Risk Score Q2 2022/23	Risk Score Q3 2022/23	Risk Score Q4 2022/23	(Current) Risk Score Q1 2023/24	Target Risk Score
R10	Information and Cyber Security	Cabinet Member for Organisational Transformation	Transformation & Corporate / People, Policy & Transformation	12	12	12	12	8
R11	Schools Finance / Cost Pressures	Deputy Leader & Cabinet Member for Education & Early Years	Chief Executive / Education Services	12	12	12	12	12
R12	Demand for ALN and SEN support	Deputy Leader & Cabinet Member for Education & Early Years	Chief Executive / Education Services	12	12	12	12	6
R13	Educational Out of County Placements	Deputy Leader & Cabinet Member for Education & Early Years	Chief Executive / Education Services	12	12	12	12	4
R14	Welsh Government's Net Carbon Zero Target by 2030	Cabinet Member for Climate Change & Biodiversity	Environment & Sustainability / Environment & Public Protection	12	12	12	12	2
R15	City Centre Security and Safety	Cabinet Member for Infrastructure & Assets	Environment & Sustainability / Infrastructure	10	10	10	10	9

Appendix 2 – Quarter 1 23/24 NCC Service Area Risk Summary

Directorate	Service Area	Total Q1 Risks	Risk Scores Increased since Q4	Risk Scores Decreased since Q4	No Change since Q4	New Risks Since Q4	Closed Risks Since Q4	Escalated Risks* ₁	De-escalated Risks* ₂
Chief Executive	Education	5	0	0	5	0	0	0	0
	Regeneration & Economic Development	4	0	0	4	0	0	0	0
Environment & Sustainability	Environment & Public Protection	4	0	0	4	0	0	0	0
	Housing & Communities	3	0	0	3	0	1	0	0
	Infrastructure	5	0	0	5	0	0	0	0
Social Services	Adult Services	4	0	0	4	0	0	0	0
	Children Services	3	0	0	3	0	0	0	0
	Prevention & Inclusion	1	0	0	1	0	1	0	0
Transformation & Corporate	Finance	6	1	0	5	0	0	1	0
	Law & Standards	2	0	0	2	0	0	0	0
	People, Policy & Transformation	6	0	0	6	0	0	0	0
Total		43	1	0	42	0	2	1	0

*1 – Escalated Risks – Risks that have been escalated from Service area risk registers to Corporate Risk Register

*2 – De-escalated Risks – Risks that have been de-escalated from Corporate Risk Register to service area risk register

Glossary

This document provides an explanation of terminology used in this report and supporting documents.

Risk Appetite – the amount of risk that Newport City Council is willing to seek or accept in the pursuit of the Council's long-term objectives.

Inherent Risk Score – The level of risk in the absence of any existing controls and management action taken to alter the risk's impact or probability of occurring.

Residual Risk Score – The level of risk where risk responses i.e. existing controls or risk mitigation actions have been taken to manage the risk's impact and probability.

Target Risk Score – The level of risk (risk score) that Newport City Council is willing to accept / tolerate in managing the risk. This is set in line with the Council's overall risk appetite.

Risk Mitigation Action – Actions identified by the Risk Owner to respond to the risk and reduce the impact and probability of the risk of occurring.

Risk Mitigation Action (Red Progress Score) – Significant issue(s) have been identified with the action which could impact on the ability of the action meeting its completion date. Immediate action / response is required resolve its status.

Risk Mitigation Action (Amber Progress Score) – issue(s) have been identified that could have a negative impact on the action achieving its completion date. Appropriate line manager(s) should be informed and where necessary action taken.

Risk Mitigation Action (Green Progress Score) – The action is on course for delivering to the agreed completion date and within the agreed tolerances.

How the Council Assesses Risk

An assessment of the likelihood and impact of risk is important to measure, compare and monitor risks to ensure efficient use of resources and effective decision making. This assessment is carried out using the risk matrix as described below.

Risk Assessment Matrix

A Corporate Risk Register will contain the high-level risks for the whole authority. In order to differentiate between these high level risks a 5x5 risk assessment matrix will be applied. The matrix is shown below, and further detail is included in appendix 3.

Risks are scored using the scoring system for probability and impact and assigned a rating based on the tolerances set out in the matrix below

Score	Description	Impact Measures						
		Strategic / Policy	Operational / Business Continuity	Financial	Governance / Legal / Regulatory	Health & Safety	Reputational	Project Delivery / Savings / Benefits
5	Severe	Failure of a key strategic objective	Serious organisational / service failure that has direct impact on stakeholders including vulnerable groups. Service disruption over 5+ days.	<u>Corporate / Project</u> Unplanned and/or additional expenditure disturbance. Capital > £1M Revenue >£1M	Legislative / Regulatory breach resulting in multiple litigation / legal action taken on the Council (linked to Financial / Reputational Impacts).	Multiple major irreversible injuries or deaths of staff, students or members of public. (Linked to Financial / Reputational Impacts)	Severe and persistent National media coverage. Adverse central government response, involving (threat of) removal of delegated powers. Officer(s) and / or Members forced to Resign.	Project status is over 12 months from anticipated implementation date. Project(s) do not deliver the major benefits / savings identified in business case. This is linked to Financial / Strategic / Reputational Impacts
4	Major	Severe constraint on achievement of a key strategic objective	Loss of an important service(s) for a short period that could impact on stakeholders. Service disruption between 3-5 days.	<u>Corporate / Project</u> Unplanned and/or additional expenditure disturbance. Capital > £0.5M - £1.0M Revenue >£0.5M-£1M	Serious legislative breach resulting in intervention, sanctions and legal action. (Linked to Financial / Reputational Impacts)	Major irreversible injury or death of staff, student or member of public. (Linked to Financial / Reputational Impacts)	Adverse publicity in professional / municipal press, affecting perception / standing in professional /local government community Adverse local and social media publicity of a significant and persistent nature.	Project status is 6 to 12 months over from anticipated implementation date. Project(s) do not deliver major benefits / savings identified in business case. This is linked to Financial / Strategic / Reputational Impacts

Score	Description	Impact Measures						
		Strategic / Policy	Operational / Business Continuity	Financial	Governance / Legal / Regulatory	Health & Safety	Reputational	Project Delivery / Savings / Benefits
3 Page 460	Moderate	Noticeable constraint on achievement of a key strategic objective / Service Plan objective.	Loss and/or intermittent disruption of a service between 2-3 days.	<u>Corporate / Project</u> Unplanned and/or additional expenditure disturbance. Capital = £0.25M - £0.5M Revenue = £0.25M to £0.5M Revenue = £0.25M to £0.5M	Significant legislative breach resulting in investigation. (Linked to Financial / Reputational Impacts)	Major reversible injury to staff, student or member of public. Not life threatening. (Linked to Financial / Reputational Impacts)	Adverse local publicity / local public opinion including social media. Statutory prosecution of a non-serious nature.	Project status is 1 to 6 months over from anticipated implementation date. There is significant reduction on delivery of benefits / savings identified in business case. This is linked to Financial / Strategic / Reputational impacts.
2	Low	Constraint on achievement of Service Plan objective that does not impact on Corporate Strategy	Brief disruption of service that has a minor impact on the delivery of a service. Service disruption 1 day.	<u>Corporate / Project</u> Unplanned and/or additional expenditure disturbance. Capital = £0.1M - £0.25M Revenue = £0.1M – £0.25M	Moderate impact leading to warning and recommendations.	Some minor reversible injuries. (Linked to Financial / Reputational Impacts)	Contained within Directorate Complaint from individual / small group, of arguable merit	Project status is 1 to 4 weeks over from anticipated implementation date. There is minor reduction on delivery of benefits / savings identified in business case. This is linked to Financial / Strategic / Reputational impacts.

Score	Description	Impact Measures						
		Strategic / Policy	Operational / Business Continuity	Financial	Governance / Legal / Regulatory	Health & Safety	Reputational	Project Delivery / Savings / Benefits
1	Very Low	Constraint on achievement of Service / Team Plan objective	Minor disruption of a non-critical service.	<p><u>Corporate / Project</u></p> <p>Unplanned and/or additional expenditure disturbance.</p> <p>Capital < £100k Revenue <£100k</p>	No reprimand, sanction or legal action.	Some superficial injuries. (Linked to Financial / Reputational Impacts)	Isolated complaint(s) that are managed through the corporate complaints process and service area.	<p>Project status is 1 week over from anticipated implementation date.</p> <p>There is insignificant / no impact on delivery of benefits / savings identified in business case.</p> <p>This is linked to Financial / Strategic / Reputational impacts.</p>

Score	Probability	Criteria
5	Very likely 75% +	<p>Systematic Risks – Local evidence indicating very high probability of occurrence if no action / controls are in place. Risk is highly likely to occur daily, weekly, monthly, quarterly.</p> <p>Emerging Risks – National and Global evidence indicating very high probability of occurrence on local communities if no action / controls are taken. Risks are highly likely to occur within the next 5 years.</p>
4	Likely 51-75%	<p>Systematic Risks – Local evidence indicating high probability occur in most circumstances with near misses regularly encountered e.g. once or twice a year.</p> <p>Emerging Risks – National and Global evidence indicating high probability of occurrence on local communities if no action / controls are taken. Risks are likely to occur within the next 5-10 years.</p>
3	Possible 26-50%	<p>Systematic Risks – Local evidence indicating distinct possibility with circumstances regularly encountered and near misses experienced every 1-3 years.</p> <p>Emerging Risks – National and Global evidence indicating distinct probability of occurrence on local communities if no action / controls are taken. Risks are likely to occur within the next 10-15 years.</p>
2	Unlikely 6-25%	<p>Systematic Risks – Local evidence indicating low to infrequent near misses experienced every 3 + years.</p> <p>Emerging Risks – National evidence indicating low probability of occurrence on local communities if no action / controls are taken. Risks are likely to occur within the next 16-25 years.</p>
1	Very Unlikely	<p>Systematic Risks – Local evidence indicating risk has rarely / never happened or in exceptional circumstances.</p> <p>Emerging Risks – National evidence indicating very low probability of occurrence on local communities if no action / controls are taken. Risks are likely to occur within the next 16-25 years.</p>

Systematic Risks – Risks that are known or are becoming part of social, cultural, economic, and environmental systems that govern our lives.

Emerging Risks – Risks that are further away, less defined, and early stage of being known about.

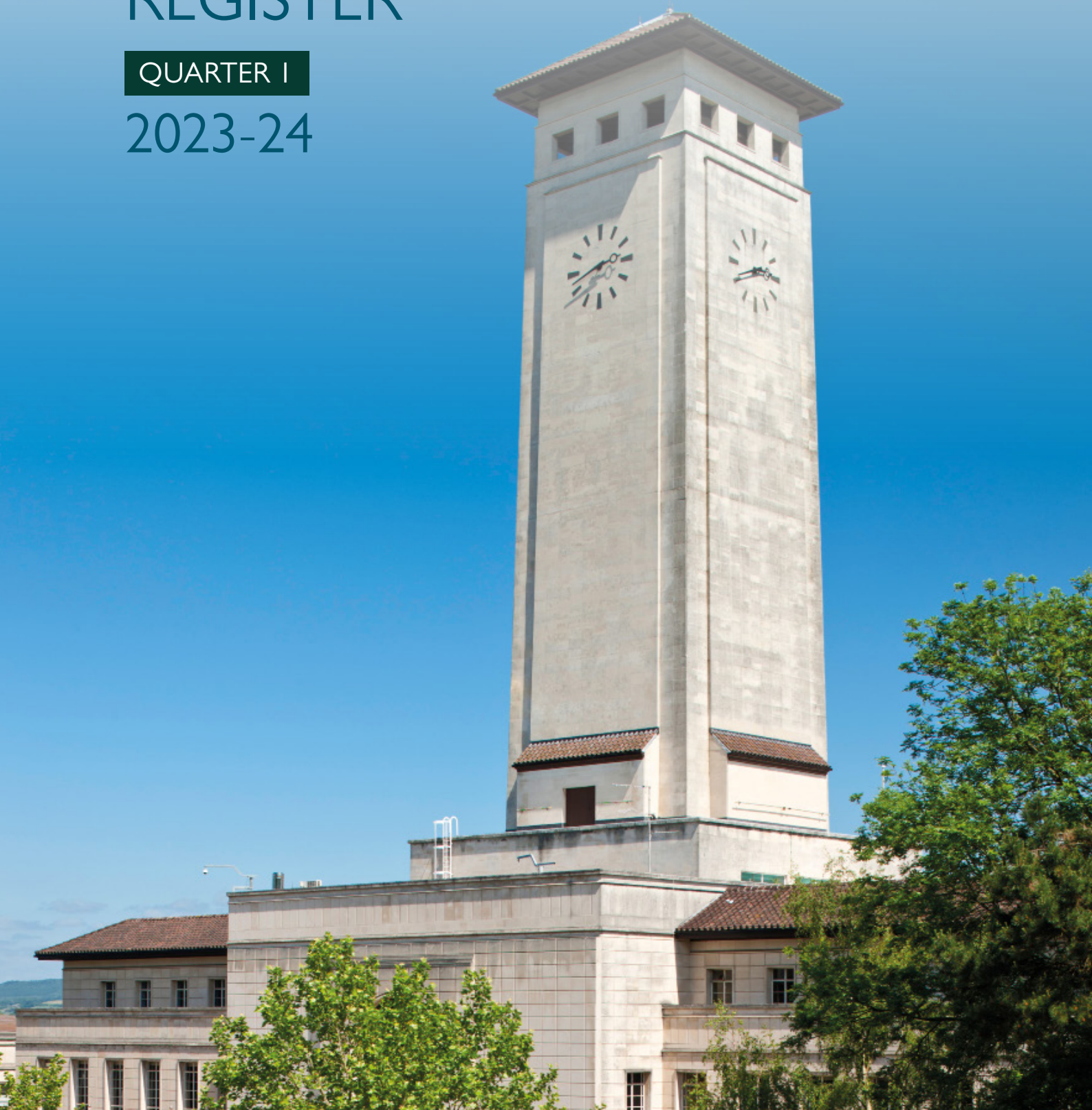


NEWPORT
CITY COUNCIL
CYNGOR DINAS
CASNEWYDD

CORPORATE RISK REGISTER

QUARTER I




2023-24






Corporate Risk Report Definitions

Direction of Risk

The change of risk score between previous quarter and the current quarter being reported.

Direction of Risk	Definition
	The risk score has decreased / improved since the last quarter update.
	The risk score has increased / worsen since the last quarter update.
	The risk score has remained the same since the last quarter update.

Risk Mitigation Action Plan

RAG Assessment	Definition
	Action is on track to be completed by the Agreed target date.
	Action is mainly on track with some minor issues preventing the action being completed by the agreed target date. Management interventions required to improve performance and close monitoring by the Head of Service / Service Management Team.
	Action is not on track with major issues preventing the action being completed by the agreed target date. Immediate management interventions and escalation to Directorate Management Board required to improve performance.

Abbreviations

ALN – Additional Learning Needs
 BP – Business Partner
 CCP – Climate Change Plan
 DOR – Direction of Risk.
 IA – Internal Audit
 LAEP – Local Area Energy Plan
 MTFP – Medium Term Financial Plan
 NCC – Newport City Council
 OOC – Out of County
 PPT – People Policy & Transformation
 RAG – Red / Amber / Green
 RSL – Registered Social Landlord
 SEN – Special Education Needs
 SRS – Shared Resource Service (Newport Council's IT Partner)
 WLGA – Welsh Local Government Association
 YJS – Youth Justice Service
 'Name' – RAG – Defines a programme or project monitoring from service area plans

Balancing the Council's Medium Term Budget

Risk Overview	To meet the Council's requirement of reducing the gap between Council spend and Budget allocation over the next 3-5 years
Parent Service(s)	Finance (sv)
Lead Cabinet Member(s)	Leader of the Council & Cabinet Member for Economic Growth & Investment







Existing Arrangements to Manage Risk

Governance	<ul style="list-style-type: none"> Finance reported to key strategic boards on monthly basis e.g. Executive Board, Directorate Management Boards, Corporate Management Team, Service Area Management teams. Finance updates reported to Cabinet on revenue and capital position. Corporate Governance and Council Constitution sets roles and responsibilities of financial management.
Internal Controls & Processes	<ul style="list-style-type: none"> Monthly finance (revenue and capital) forecasting of budgets to identify budget pressures and savings. Finance Business Partners supporting budget holders / senior managers. Budget setting process with senior officers / budget holders. Includes consultation with public and other key stakeholders.
Other Arrangements	<ul style="list-style-type: none"> Regulatory / Audit Wales review of Council finances. Internal Audit reviews of finance and financial controls. Local authority network and reporting to Society of Welsh Treasurers and Welsh Government.

Direction of Risk

	DoR	Comment
Balancing the Council's Medium Term Budget	➔	During the last quarter, the Council set its revenue budget for 2023/24, which reflected a balanced budget, as per the legal requirements. However, despite setting a balanced budget for 2023/24, the medium term outlook remains extremely challenging, with a £27m budget gap currently identified. This will prove difficult to address, considering the level of savings already identified for 2023/24. In addition, there remains significant uncertainty in relation to inflationary pressures and potential funding constraints over the medium term horizon, which could add to the budget gap currently identified. The overall rating, therefore, remains at the same level as the previous quarter.

Risk Mitigation Action Plan

Mitigating Action	Start Date	Target Date	Estimated Completion Date	Performance
 Finance Business Partner reviews of service area monitoring positions	01 Jun 2023	31 Jan 2024	31 Jan 2024	★
 Regular discussion with Society of Welsh Treasurers.	01 Jul 2023	29 Feb 2024	29 Feb 2024	
 Senior leadership and Cabinet engagement int MTFP preparations	01 Jun 2023	31 Mar 2024	31 Mar 2024	★
 Service area finance challenge reviews	01 Jul 2023	31 Dec 2023	31 Dec 2023	

City Centre Security & Safety

Risk Overview	Minimise the risks and disruption to people and businesses due major incidents or deliberate acts that pose hazards to people and business and can result in structural damage; damage/disruption to infrastructure and utilities; impacts on business continuity, reputation, and the economy, in both the city centre and affected surrounding areas.
Parent Service(s)	Infrastructure (sv)
Lead Cabinet Member(s)	Cabinet Member for Infrastructure & Assets



Existing Arrangements to Manage Risk

Governance	<ul style="list-style-type: none"> The Protect Duty Act is currently going through Parliament, which will create a statutory duty for Counter Terrorism preparedness to be undertaken across all city centres across the UK. Newport City Council along with the Wales Extremism Counter Terrorism Unit (WECTU), Heddlu Gwent Police and other emergency services have formed the Newport City Council Protectiveness Security and Preparedness Groups (PSPGs), chaired, and led by NCC. A key role of PSPGs will be the multi-agency assessment of current risk and vulnerabilities, and provision of effective mitigation in a proportionate manner. PSPGs will also ensure responsibilities under the new Protect Duty are discharged.
Internal Controls & Processes	<ul style="list-style-type: none"> Included in the NCC Infrastructure Service Area Plan is the objective to ensure Newport City Council is meeting its requirements under the Civil Contingencies Act, by developing and having in place effective governance and control arrangements to identify, prepare and respond to events in Newport. Supporting this objective, the Council has a well-established and integrated Corporate Emergency Management Plan, which outlines arrangements which are intended to assist the co-ordination of the Authority's response to any actual, or threatened incident, or emergency, while maintaining normal services as far as possible. The plan provides a flexible framework of procedures to enable a quick, effective and appropriate response to mitigate the effects of an incident or emergency that may have an impact on the Council's response. The Council's Emergency Management Structure provides a framework of integrated emergency management to ensure co-ordination within the Council and with external agencies. The structure enables the Council to respond at an operational, tactical and strategic level. At a strategic level in any incident a Gold Duty Officer (Chief Executive, Strategic Director, Head of Service) will be available to decide on what actions to take. Via the Civil Contingencies Duty Officer systems, the Council also provides a 365 24/7 incident response. Consideration to be given to incorporating structured and strategic conversations about security and counter terrorism into pre application stage of major developments.
Other Arrangements	<ul style="list-style-type: none"> Through the duties of the Civil Contingencies Act 2004, that Council also works in partnership with key responding agencies, including the emergency services, to ensure a timely and effective multi agency response to incidents. Multi Agency Plans and Procedures are developed via the Gwent Local Resilience Forum. Due to significant recent major incidents across the UK (Manchester Arena Bombing) the Council with its partners review any recommendations resulting from inquiries to ensure that where necessary appropriate learning is integrated into existing plans and procedures.

Direction of Risk

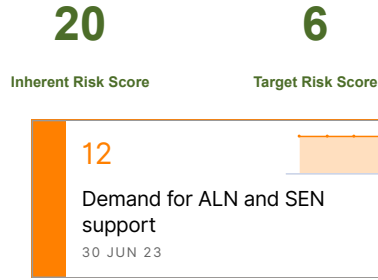
	DoR	Comment
City Centre Security & Safety	➔	The risk score for quarter 1 remains the same and work is continuing with partners to improve the infrastructure and processes in place.

Risk Mitigation Action Plan

Mitigating Action	Start Date	Target Date	Estimated Completion Date	Performance
<input checked="" type="checkbox"/> City Centre Training to Businesses	28 Feb 2020	31 Mar 2024	31 Mar 2024	●
<input checked="" type="checkbox"/> Co-ordinated evacuation arrangements	31 Mar 2020	31 Mar 2024	31 Mar 2024	●

Demand for ALN and SEN support

Risk Overview	Funding to cover Additional Learning Needs (ALN) and Special Education Needs (SEN) provision across the city is insufficient and does not meet the demand of increasing need.
Parent Service(s)	Education Services (sv)
Lead Cabinet Member(s)	Deputy Leader & Cabinet Member for Education & Early Years



Existing Arrangements to Manage Risk

Governance	<ul style="list-style-type: none"> Schools Forum review and agree funding formulas and funding arrangements for school Schools Forum Finance sub-group. ALN Panel scrutinise pupil information to identify if a specialist placement is needed as part of their statutory duty.
Internal Controls & Processes	<ul style="list-style-type: none"> ALN Implementation finance subgroup review and discuss a number of funding formula models and agree on the most appropriate to be presented firstly to the Schools forum Finance Sub-Group and if in agreement will be presented at Schools Forum for ratification. ALN Panel scrutinise pupil information to identify if a specialist placement is needed as part of their statutory duty. Specific OOC ALN Officer responsible for monitoring OOC provision and where possible look for local alternative provision.
Other Arrangements	<ul style="list-style-type: none"> Newport LA has commissioned 14 places at Catch 22 a primary age Social, Emotional, Behaviour Difficulties Independent Education Provider to reduce the risk of pupils requiring OOC placements.

Direction of Risk

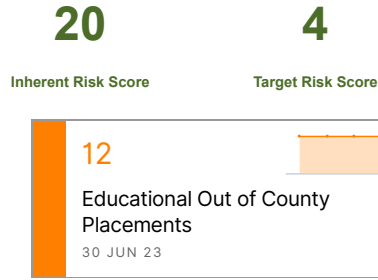
	DoR	Comment
Demand for ALN and SEN support	➔	The risk score has remained static as we continue to maintain the risk within the service area. The ALN Implementation group met to review the ALN funding formula during the summer term and decided to continue with the formula until it is fully implemented in 2024-25 which will allow a full review of the impact. However due to the increased cost of Teaching Assistants and the potential budget risks for schools this may cause an additional pressure in the future.

Risk Mitigation Action Plan

Mitigating Action	Start Date	Target Date	Estimated Completion Date	Performance
 Develop a Post – 16 Transition Plan to support ALN learner at all points of transition.	01 Sep 2022	31 Mar 2024	31 Mar 2024	★
 Develop feedback system for learners, parents & carers to support effective stakeholder engagement	01 Nov 2022	31 Mar 2024	31 Mar 2024	★
 Embed anti-poverty strategy across Education Service	01 Sep 2022	31 Mar 2024	31 Mar 2024	★
 Extend specialist provision including Welsh medium within the city to reduce OOC Placements	01 Apr 2022	31 Mar 2024	31 Mar 2024	★
 Implement the ALN and Educational Tribunal Act 2018...	01 Apr 2022	31 Mar 2024	31 Mar 2024	★

Educational Out of County Placements

Risk Overview	Limited access to Newport City Council (NCC) provision for pupils who require complex and specialist placements which results on a reliance on Out of County (OOC) placements both day and residential.
Parent Service(s)	Education Services (sv)
Lead Cabinet Member(s)	Deputy Leader & Cabinet Member for Education & Early Years



Existing Arrangements to Manage Risk

Governance	<ul style="list-style-type: none"> ALN Panel scrutinise pupil information to identify if a specialist placement is needed as part of their statutory duty. Procurement and Head of Service approval needed for OOC placements.
Internal Controls & Processes	<ul style="list-style-type: none"> ALN Panel scrutinise pupil information to identify if a specialist placement is needed as part of their statutory duty. Monthly budget monitoring and review of cost of planned OOC placements Procurement and Head of Service approval needed for OOC placements. Specific OOC ALN Officer responsible for monitoring OOC provision and where possible look for local alternative provision.
Other Arrangements	<ul style="list-style-type: none"> Newport LA has commissioned 14 places at Catch 22 a primary age Social, Emotional, Behaviour Difficulties Independent Education Provider to reduce the risk of pupils requiring OOC placements.

Direction of Risk

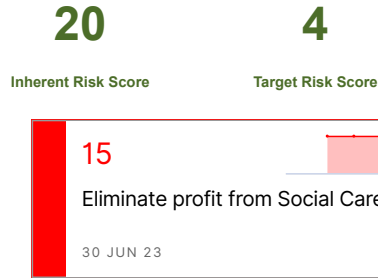
	DoR	Comment
Educational Out of County Placements	➔	The OOC risk remains static this quarter. Although there has been a rise in the need for specialist placements, an increase in the cost of OOC placements and recent residential OOC placements for 2 pupils have led to an additional £200k spend on education provision, these additional costs are being managed within the service area. Additional local placements have been gained through the opening of the new ASD Base at Llanwern High School in September 2023 and the completion of the tendering process for a secondary Social, Emotional, Behaviour Difficulties (SEBD) provision. The Local Provision Development budget is funding the Base and the SEBD tender which has put a pressure on the LPD budget which is also being managed within the service area. Education and Finance are closely monitoring the in-year budget pressure to mitigate the risk for the remainder of the financial year.

Risk Mitigation Action Plan

Mitigating Action	Start Date	Target Date	Estimated Completion Date	Performance
 Develop a Post – 16 Transition Plan to support ALN learner at all points of transition.	01 Sep 2022	31 Mar 2024	31 Mar 2024	★
 Develop feedback system for learners, parents & carers to support effective stakeholder engagement	01 Nov 2022	31 Mar 2024	31 Mar 2024	★
 Embed anti-poverty strategy across Education Service	01 Sep 2022	31 Mar 2024	31 Mar 2024	★
 Extend specialist provision including Welsh medium within the city to reduce OOC Placements	01 Apr 2022	31 Mar 2024	31 Mar 2024	★
 Implement the ALN and Educational Tribunal Act 2018...	01 Apr 2022	31 Mar 2024	31 Mar 2024	★

Eliminate profit from Social Care

Risk Overview	Increased pressure on Local Authorities to ensure children are placed in accommodation which does not make profit from children by 2027 as part of Welsh Government Legislation. Although Welsh LA's support this in principle it may lead to LA's being forced into developing unregistered emergency placements for children. This is costly and could lead to prosecution of the Head of Children's Services.
Parent Service(s)	Children Services (sv)
Lead Cabinet Member(s)	Cabinet Member for Social Services



Existing Arrangements to Manage Risk

Governance	<ul style="list-style-type: none"> Children Services is working both nationally and regionally to create opportunities to reduce the risks. The Council's Corporate Plan and Service Plan has identified this as a strategic priority to deliver over the next 5 years. Regional collaborative working to identify options and opportunities to create in-house services. Bids have been submitted to WG to develop care homes for children and to assist with developing edge of care provisions in order to reduce the numbers of children entering the care system.
Internal Controls & Processes	<ul style="list-style-type: none"> Newport Council has several settings such as Windmill Farm, and Rosedale Cottage which provide in-house provision which is also available to other local authorities. Bids have been submitted to Welsh Government to develop further provision in Newport. Newport fostering team has a recruitment campaign which is aligned with Foster Wales
Other Arrangements	<ul style="list-style-type: none"> Newport is working with Action for Children to develop a local residential provision for our disabled children and developing further residential provision for our Unaccompanied Asylum Seeker Children. NCC has submitted a bid to Welsh Government for revenue funding up to £15m to support the delivery of this new requirement over the next 3 years. The funding will be used to develop projects to build in-house placement sufficiency. However, after the three year period it is uncertain whether NCC will receive additional funding. It is anticipated for NCC to be notified by the quarter 3.

Direction of Risk

	DoR	Comment
Eliminate profit from Social Care	→	Risk score has remained the same for this quarter. However, there remains a significant risk of legal challenges against the Council where placements have to be made to practices 'Operating without Registration'.

Risk Mitigation Action Plan

Mitigating Action	Start Date	Target Date	Estimated Completion Date	Performance
 Focus on developing specialist fostering placements with psychological support.	01 Oct 2022	31 Mar 2024	31 Mar 2024	●
 Increase the proportion of foster care provision within Newport.	01 Oct 2022	31 Aug 2024	31 Aug 2024	★
 Residential Children's Homes Programme - RAG	01 Apr 2021	31 Mar 2028	31 Mar 2028	●

Failure to achieve completion of the Annual IA Plan

Risk Overview	The Internal Audit (IA) Plan comprises of opinion and non-opinion related audit jobs and is based on a number of audit days available to undertake the work. If not enough opinion related jobs are completed to draft report stage by the end of the financial year this could impact on the CIA's ability to provide an overall opinion on the adequacy of the internal control environment, governance arrangements and risk management processes operated within the Council.
Parent Service(s)	Finance (sv)
Lead Cabinet Member(s)	Leader of the Council & Cabinet Member for Economic Growth & Investment







Existing Arrangements to Manage Risk

Governance	<ul style="list-style-type: none"> The Internal Audit team report to the Council's GAC, on the delivery of the Internal Audit Plan. Additional arrangements will be put in place for regular updates to be provided by the Head of Finance and Director of Transformation & Corporate on the delivery of the Audit Plan, recruitment of officers and exploration of potential options for the long term arrangements for the Internal Audit function.
Internal Controls & Processes	<ul style="list-style-type: none"> As part of the Council's duty, the Audit Plan target for 23/24 has reduced from 80% to 50%. The Acting Chief Internal Auditor and Head of Finance are also reviewing the current Internal Audit Plan to prioritise work on the highest risk areas of the Council. This will be presented to the Council's Executive Board and GAC at the next committee meeting in September. Staffing support counter fraud activity including investigations.
Other Arrangements	<ul style="list-style-type: none"> Internal Audit will call in external audit provision through the South Wales Audit Partnership service to support the delivery of high risk audit jobs. Head of Finance and Director for T&C are also exploring long term Internal Audit arrangements for the delivery of the Internal Audit service. This would bring other potential advantages such as access to wider skills and improved resilience.

Direction of Risk

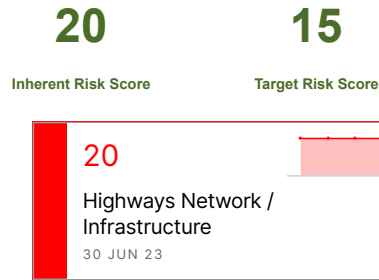
	DoR	Comment
Failure to achieve completion of the Annual IA Plan	✘	<p>In the last quarter the Internal Audit team has seen 4 experienced officers leaving the team and the acting Chief Internal Auditor will be leaving the authority in September leaving 1 full time equivalent (FTEs) in post for an establishment of 6.5 FTEs. In response the Council is commencing a recruitment campaign to appoint into the vacancies and is using external audit resource to deliver 130 planned days of work (circa 10/11 opinion related audits). The Council will also be exploring longer term options for the service.</p> <p>As at the end of Quarter 1 it will not be possible for the Internal Audit team to achieve the completion of the original Internal Audit Plan for the full year as regards 'opinion related' audits and some non-opinion work will stop / be reduced to provide focus on the opinion related work. It is predicted that of the 45 opinion related audits in the approved plan – completion could be about 24 – 34 dependent on recruitment. The team over last 6 years have completed between 30-35 opinion related audits and therefore the risk here is that we are unable to recruit resulting in completion of the lower figure of the above range. If that was the case, the service will only be able to provide limited assurance on the effectiveness of the Council's internal control, governance and risk management arrangements at best.</p>

Risk Mitigation Action Plan

Mitigating Action	Start Date	Target Date	Estimated Completion Date	Performance
 Establish interim Audit Manager arrangements to deliver a service	03 Jul 2023	30 Sep 2023	30 Sep 2023	
 Review & assess long term arrangements for the Internal Audit service	01 Aug 2023	31 Dec 2023	31 Dec 2023	
 Review and deliver a revised Internal Audit plan for 23/24	01 Aug 2023	31 Mar 2024	31 Mar 2024	
 Undertake urgent recruitment to fill vacancies in the Internal Audit Team	01 Aug 2023	31 Dec 2023	31 Dec 2023	

Highways Network / Infrastructure

Risk Overview	Failure to recognise current levels of under investment in the whole life of the city's highway network assets in the medium to long term will continue to compound existing maintenance backlog figures.
Parent Service(s)	Infrastructure (sv)
Lead Cabinet Member(s)	Cabinet Member for Infrastructure & Assets



Existing Arrangements to Manage Risk

Governance	<p>Highway Asset Management Plan</p> <ul style="list-style-type: none"> A quinquennial Highway Asset Management Plan (HAMP) is produced by City Services, which was last refreshed in 2019. It seeks to document the activities, processes, and information to support strategic investment decisions and long-term maintenance planning. It provides information on the assets we have responsibility for, monitors how they are performing, documents their depreciation and confirms levels of funding required to mitigate the demands placed upon them. <p>Highway Annual Status and Options Report</p> <ul style="list-style-type: none"> The highway Annual Status and Options report is a product of the HAMP that records the condition of the assets and seeks to identify and prioritise the funding need. The report sets out the status of our assets in terms of extent, value and condition and presents the projected outcome of identified investment options. <p>Highway Maintenance Manual</p> <ul style="list-style-type: none"> The Highway Maintenance Manual documents how the council manages the city's highway maintenance. It sets out how, as highway authority, it discharges its duties and the management of user risk.
Internal Controls & Processes	<ul style="list-style-type: none"> To ensure the asset condition, maintenance requirement and its associated risk to the highway user is understood, the service area undertakes the following internal controls and processes: <p>Reactive Safety Inspections</p> <ul style="list-style-type: none"> These are inspections undertaken in response to stakeholder notification of potential maintenance defects <p>Routine Inspections</p> <ul style="list-style-type: none"> This is a regime of planned safety inspections designed to identify defects that have the potential to cause harm to users and defects that require repair in order to prevent escalation of deterioration and increased (avoidable) maintenance needs. <p>Condition Surveys</p> <ul style="list-style-type: none"> These are both visual and specialist road condition "machine based" surveys, that record the condition of components of the asset to enable a programme of renewal/replacement to be prepared
Other Arrangements	<ul style="list-style-type: none"> The Highway Asset Management Plan projects an anticipated annual capital investment of £500k and an anticipated £1.86m revenue investment through to the end of the current plan in 2023/24.

Direction of Risk

	DoR	Comment
Highways Network / Infrastructure	➔	<p>Nationally, the condition of the country's highway infrastructure asset as a whole continues to be a cause of concern as a result of historic underinvestment.</p> <p>Within Newport, the annual highway network investment has continued to decrease over time whilst the number of roads maintainable at public expense and asset usage has continued to rise. Investment levels are failing to maintain "steady State" as a minimum asset condition. Therefore, asset condition continues to deteriorate year on year.</p> <p>In addition to the impact of increased vehicles and usage of assets, increases in permitted axle weights, wetter winters and hotter summers are all resulting in accelerated deterioration and unpredictable asset failure.</p> <p>2022/23 saw a significant decline in highway asset condition, especially within the carriageway and structures (bridges) asset groups. This is anticipated to continue this financial year.</p>

Risk Mitigation Action Plan

Executive Board have accepted no further Risk Mitigation can be undertaken to manage the risk. Ongoing assurance provided through internal / external audit reviews and regular risk assessments through Directorate / Service Area.

Information and Cyber Security

Risk Overview	Management and security of the Council's data to protect from being accessed and processed inappropriately. This includes preventing inappropriate access, loss, theft, and malicious attacks to maintain business continuity and integrity of our data.
Parent Service(s)	People, Policy & Transformation (sv)
Lead Cabinet Member(s)	Cabinet Member for Organisational Transformation



Existing Arrangements to Manage Risk

Governance	<ul style="list-style-type: none"> Existing governance is documented in the council's information risk management policy. This includes internal groups such as the Information Governance Group chaired by the Director – Transformation and Corporate and the Data Protection Group. It also includes roles of Senior Information Risk Owner (SIRO), Data Protection Officer (DPO), the Information Management team and a designated Cabinet Member with this strategic responsibility. The Annual Information Risk Report is formally reviewed by Overview Scrutiny Management Committee and Cabinet Member – Organisational Transformation. Existing Organisation / Service Area management structure to report and escalate issues to senior officers. Also could be a Programme / Project Board, Task & Finish Group or other governance group which are aware and have oversight of the risk.
Internal Controls & Processes	<ul style="list-style-type: none"> An Annual IT Health Check is carried out in line with requirements of the Public Services Network (PSN). Regular hardware and software updates are carried out by the IT Service. Technical controls are in place including the use of endpoint protection, firewalls, encryption, backups, security certificates, mobile device management etc. Physical security measures are in place to prevent inappropriate access. Data Protection Impact Assessments (DPIA's) are carried out and an Information Risk Register is managed. The council's IT Service, the Shared Resource Service (SRS), has a security function complementing council staff as well as security embedded in various roles. The council has processes for out of hours incidents including the SRS.
Other Arrangements	<ul style="list-style-type: none"> Audit Wales conducts independent reviews including on cyber security. The council is a member of the Warning and Reporting Point (WARP). Shared Resource Service is responsible for the Council's management of systems and processes.

Direction of Risk

	DoR	Comment
Information and Cyber Security	➔	<p>The overall risk score is unchanged although probability has reduced slightly due to technical measure, including Security Operations Centre (SOC) and Event Management, and migration of the council's data centre with improved back up facilities to the cloud.</p> <p>Existing governance is documented in the council's information risk management policy including the Information Governance Group, Senior Information Risk Owner (SIRO) role and the Annual Information Risk Report. An Annual IT Health Check is completed in line with the requirements of the Public Services Network (PSN) and compliance was achieved June 2023. Technical controls are in place alongside physical security measures. The council's IT Service, the Shared Resource Service (SRS), supports through their security function and joint processes for out of hours incidents.</p> <p>The Audit Wales review of Cyber Security was finalised last quarter and we will include the follow up actions in our annual information risk management reporting.</p>

Risk Mitigation Action Plan

Mitigating Action	Start Date	Target Date	Estimated Completion Date	Performance
 Improve Cyber resilience and information security governance	01 Apr 2023	31 Mar 2027	31 Mar 2027	★
 Information & cyber awareness raising and training	01 Apr 2023	31 Mar 2024	31 Mar 2024	★
 Progress implementation of Audit Wales Recommendations	01 Aug 2023	31 Aug 2024	31 Aug 2024	

Newport Council's Property Estate

Risk Overview	NCC has a significant property estate covering over 170 operational buildings (circa) such as the Civic Centre, Telford Depot, and its school estate etc. The Council has to ensure the estate is maintained to required standards to enable access, safety, security and in the long term sustainable for staff and residents to use.
Parent Service(s)	People, Policy & Transformation (sv)
Lead Cabinet Member(s)	Cabinet Member for Infrastructure & Assets



Existing Arrangements to Manage Risk

Governance	<ul style="list-style-type: none"> The Council's Capital Strategy Asset Management Group is responsible for the monitoring, delivery and reporting of the Council's Assets. This is represented by senior officers from the Council and representatives from the Council's Property Services partner, Newport Norse. The Schools' / Social Services estate is also overseen by the officer led group which also includes representatives from the Council's Property Services partner, Newport Norse and Council representatives.
Internal Controls & Processes	<ul style="list-style-type: none"> Newport Council has contract arrangement with Newport Norse who oversee the management and maintenance of the Council's estate. Service Areas are responsible for the building assets which they use across the Council's estate. Newport Norse are responsible for undertaking regular building condition assessments to ensure that they meet necessary legislative and building regulations. The assessments completed by Newport Norse are risk assessed and reported through the Council's governance groups. Maintenance work completed on the Council's estate is prioritised based upon risk including any reactionary / immediate work that has to be completed. School's estate is devolved to schools and managed through their arrangement with Newport Norse and the Corporate Landlord Policy establishes responsibilities also.
Other Arrangements	<ul style="list-style-type: none"> Newport Council has a maintenance budget of £1.5m in its capital programme. However, it is estimated that the Council should be spending £8.5m pa. The Council has a contract arrangement with Newport Norse to oversee and manage the estate portfolio (including schools)

Direction of Risk

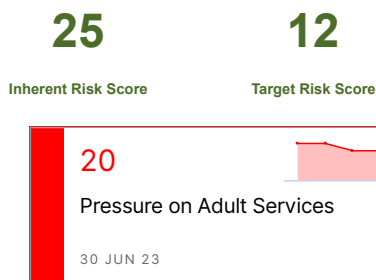
	DoR	Comment
Newport Council's Property Estate	➔	The risk reflects the significant investment required in the property estate across a range of properties. The Council have begun on a significant rationalisation programme which will include discussions around targeted investment to reduce this risk score. However at this stage, there have been no significant changes to the estate that would warrant a change in the risk score.

Risk Mitigation Action Plan

Mitigating Action	Start Date	Target Date	Estimated Completion Date	Performance
 Adherence to the Corporate Landlord Policy and ensuring that all Premises Managers are accountable.	01 Oct 2022	31 Mar 2024	31 Mar 2024	★
 Asset Rationalisation - RAG	01 Oct 2022	31 Mar 2027	31 Mar 2027	★
 Develop and manage effective contract management arrangements with Newport Norse.	01 Oct 2022	31 Dec 2025	31 Dec 2025	★
 Establish the Civic Centre investment requirements to provide a suitable office environment.	01 Oct 2022	31 Mar 2024	31 Mar 2024	★
 Review NCC Strategic Asset Management Plan, and Disposal and Asset transfer strategies.	01 Oct 2022	31 Mar 2024	31 Mar 2024	★

Pressure on Adult Services

Risk Overview	There is increasing pressure on Adult Services to deliver services to adults with complex and long lasting needs. With an increase in demand / volume of referrals and care packages the Council has seen an increase in costs whilst in the context of tightening budgets. There are also additional statutory requirements to safeguard adults in our care and prevent risk of harm, injury or a loss of life.
Parent Service(s)	Adult Services (sv)
Lead Cabinet Member(s)	Cabinet Member for Social Services



Existing Arrangements to Manage Risk

Governance	<ul style="list-style-type: none"> Newport Council has a new structure with a Director of Social Services and three service areas to deliver Social Services. There are regular Directorate and Service Area meetings held to monitor and report the delivery of Adult Services. At a regional level the Council is part of the Regional Partnership Board which oversees the delivery of social services across Gwent. A Population Needs Assessment has been undertaken for Gwent in relation to the forecasting of demand and provision of services across Newport and Gwent.
Internal Controls & Processes	<ul style="list-style-type: none"> NCC Adult Services has various mechanisms to monitor and report on the delivery of its services through financial and non-financial performance measures. Regular reports and updates are provided through Directorate, Service and Team management levels in the organisation.
Other Arrangements	<ul style="list-style-type: none"> The delivery of Adult Services is subject to External Regulatory review through Care Inspectorate Wales. Internal Audit provide assurance in relation to the delivery of Adult Services.

Direction of Risk

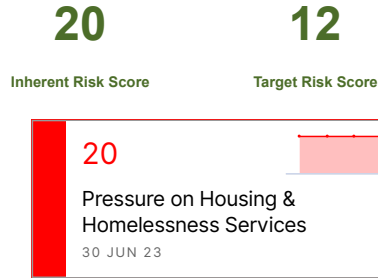
	DoR	Comment
Pressure on Adult Services	➔	Pressure remains the same, recruitment to key qualified posts continues to be an issue. Management oversight of waiting lists on a daily basis is a key task to ensure most vulnerable are prioritised. Additional Team managers in Managed care will assist the process and a stronger management structure to support staff will be a benefit.

Risk Mitigation Action Plan

Mitigating Action	Start Date	Target Date	Estimated Completion Date	Performance
 Appointeeship Service - RAG	01 Apr 2021	31 Mar 2024	31 Mar 2024	●
 Dementia Hwb in Newport - RAG	01 Oct 2022	31 Mar 2024	31 Mar 2024	●
 Hospital Service - RAG	01 Oct 2022	31 Mar 2024	31 Mar 2024	●
 Integration of Frailty service into Info, Advice & Assistance hub - RAG	01 Apr 2021	31 Mar 2024	31 Mar 2024	●
 Redesign of Adult Services - RAG	01 Oct 2022	31 Mar 2024	31 Mar 2024	★

Pressure on Housing & Homelessness Services

Risk Overview	Increased pressures being faced by the Council's housing service as result of new legislative requirements, lack of affordable permanent accommodation, cost of living crisis and uncertainty over future financial grants from Welsh Government
Parent Service(s)	Housing & Communities (sv)
Lead Cabinet Member(s)	Cabinet Member for Strategic Planning, Regulation & Housing



Existing Arrangements to Manage Risk

Governance	<ul style="list-style-type: none"> Housing and Homelessness is being monitored through existing governance arrangements through the Directorate Management Board and Service Management Team. Furthermore there are existing team arrangements to monitor and report the delivery of the service. The Housing and Homelessness teams are also involved with the Strategic Housing Forum and its associated subgroups with Registered Social Landlords and Rough Sleeper Strategic Group.
Internal Controls & Processes	<ul style="list-style-type: none"> Weekly meetings are held with the finance BP to discuss budgets and forecasting. The Housing and Homelessness teams also submit monthly finance forecasts and produce quarterly performance measures to monitor performance. There are also other operational performance measures monitored and reported through the teams. The team also submit monthly Wales Housing statistics to Welsh Government.
Other Arrangements	<ul style="list-style-type: none"> Welsh Government grants were received during 2022-23 which reduce the overall spend on the housing advice and temporary accommodation service. WG has advised that additional grant funding will be forthcoming in future years but has given no indicative figures. The Housing and Homelessness teams are also involved with the Strategic Housing Forum and its associated sub groups with Registered Social Landlords and Rough Sleeper Strategic Group. NCC provides regular monitoring performance reports on its housing and homelessness position.

Direction of Risk

	DoR	Comment
Pressure on Housing & Homelessness Services	➔	Welsh Government's changes to Homelessness legislation in December 2022 continues to have an impact on the number of households whom the authority has a statutory duty to accommodate in temporary accommodation. Supply is not keeping pace with demand and the cost of living crisis has started to increase this demand further. A number of initiatives are being explored to increase the supply of temporary and permanent housing and reduce the use of bed and breakfast and hotel accommodation. A 'prevention' team has also been created with a focus on preventing homelessness wherever possible to avoid additional placements into temporary housing.

Risk Mitigation Action Plan

Mitigating Action	Start Date	Target Date	Estimated Completion Date	Performance
 Deliver Housing Support Programme Strategy (HSPS) and undertake review of actions	01 Oct 2022	31 Mar 2024	31 Mar 2024	
 Develop a cost-effective training program, quality standards & KPIs to support housing staff.	01 Jan 2023	31 Mar 2024	31 Mar 2024	
 Develop initiatives to support an effective private rented sector.	01 Oct 2022	31 Mar 2024	31 Mar 2024	
 Newport Housing Sector Programme - RAG	01 Oct 2022	31 Mar 2027	31 Mar 2027	
 Review the Common Allocations policy in line with rapid rehousing.	01 Oct 2022	31 Mar 2024	31 Mar 2024	

Pressure on the Delivery of Children Services

Risk Overview	Children Services are facing pressures to manage increase in volume of referrals and cases of children with complex needs. This is in a context of inflationary cost rises and budgets not being able to meet these cost increases; alongside recruitment and retention issues across the Social Care sector and in Newport.
Parent Service(s)	Children Services (sv)
Lead Cabinet Member(s)	Cabinet Member for Social Services



Existing Arrangements to Manage Risk

Governance	<ul style="list-style-type: none"> Children Services delivered in accordance with Social Services and Well-being Act, Well-being of Future Generations and Children's Act. There are governance arrangements in place at local, regional and national levels. Directorate and Service Management Teams meet monthly to provide service and performance updates on the delivery of the service. This includes performance, finance and HR information to inform decision making. Additionally, the Council's Executive Board and Corporate Management Team has oversight in the delivery of services. At a regional (Gwent) level, Heads of Service and Director of Social Services represent Newport Council at the Regional Partnership Board. Service pressures are reported here and collaborative working between agencies and other local authorities. The Safeguarding Board and Children's Family Strategic Partnership Board collaboratively work at regional levels to monitor and manage demand issues.
Internal Controls & Processes	<ul style="list-style-type: none"> The Council's Children Services teams deliver services in compliance with the Social Services and Well-being Act and Children's Act. Internal Controls and processes are established to meet these requirements under the different Acts. WCCIS system monitors and records caseloads and case management across social services. Regular (Monthly) check ins and case management meetings are held between the Council's staff and managers to monitor and manage caseloads. Collaborative and co-production working takes place between Children Services and other agencies to manage caseloads. This includes Foster Wales. Human Resources – HR Business Partners support Managers with the recruitment and retention of staff including working the Council's Communications team to promote social care roles. Finance – monthly forecasting and monitoring of finances across Children services. Mechanisms in place to escalate budget pressures and Finance Business Partners forecasting demand pressures / resources. Commissioning and procurement to find best value for residential placements. Performance Management – Monthly reporting to Welsh Government and regular performance monitoring of services in Newport.
Other Arrangements	<ul style="list-style-type: none"> Care Inspectorate Wales (External Regulator) and Internal Audit provide assurance of governance, internal control and risk management. Third sector partnership working with Barnardos – prevention and statutory functions supporting families, MyST, residential homes provision, and Foster families.

Direction of Risk

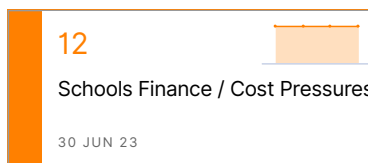
	DoR	Comment
Pressure on the Delivery of Children Services	➔	There continues to be significant pressures on delivery of services due to staff recruitment and retention challenges, increase in demand and complexity of need.

Risk Mitigation Action Plan

Mitigating Action	Start Date	Target Date	Estimated Completion Date	Performance
 Access appropriate regional and National workforce development groups.	01 Oct 2022	31 Mar 2024	31 Mar 2024	
 Acquisition of new YJS intervention hub.	01 Oct 2022	31 Mar 2025	31 Mar 2025	
 Children Services - Support staff to access social care training to social work qualification.	01 Oct 2022	31 Mar 2024	31 Mar 2024	
 Develop support provided by the YJS incorporating robust early intervention and prevention work.	01 Apr 2022	31 Mar 2024	31 Mar 2024	
 Extend the Rapid Response team with an expanded evening and weekend crisis offer.	01 Oct 2022	30 Jun 2023	31 Mar 2024	

Schools Finance / Cost Pressures

Risk Overview	Cost pressures of schools are not met resulting in increased deficit budgets
Parent Service(s)	Education Services (sv)
Lead Cabinet Member(s)	Deputy Leader & Cabinet Member for Education & Early Years



Existing Arrangements to Manage Risk

Governance	<ul style="list-style-type: none"> Structures within Education and Finance support the escalation of identified issues to senior officers, Heads of Services and Executive Board. In addition, the Schools Forum is a statutory committee which acts as a consultative body in relation to any changes to the schools funding formula, and task and finish sub-groups are created to consider specific elements where necessary. Schools Governors are also responsible for monitoring and reporting school finance positions.
Internal Controls & Processes	<ul style="list-style-type: none"> The Finance Business Partners provide a key role through their relationships with schools, and support early identification of emerging issues. Any issues are escalated to the Lead and Senior Finance Business Partners and the Assistant Head of Education to consider intervention and discussions around appropriate mitigating actions.
Other Arrangements	<ul style="list-style-type: none"> Each school has a Service Level Agreement with the Council to support them in financial planning and monitoring, although schools have a choice in the level of service they wish to procure under these arrangements.

Direction of Risk

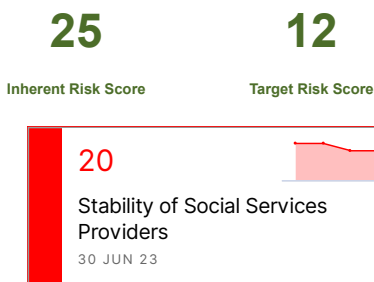
	DoR	Comment
Schools Finance / Cost Pressures	➔	Whilst one primary school closed the 2022/23 financial year in deficit, all schools across Newport are currently projecting the close the 2023/24 financial year in surplus. In many schools however this has only been possible through use of reserves, and therefore the position into 2024/25 and beyond remains fragile. Governor approved budgets have now been submitted to the Council, and work is planned to consider the impact that the use of reserves will have on future financial years.

Risk Mitigation Action Plan

Mitigating Action	Start Date	Target Date	Estimated Completion Date	Performance
 Review approved school budgets and investigate future spend plans...	01 Apr 2022	31 Mar 2024	31 Mar 2024	★

Stability of Social Services Providers

Risk Overview	The Council requires support from external providers to deliver care packages for children and adults (residential / Non Residential). The current marketplace for external providers is volatile due to the increasing costs to provide care, maintain homes, staffing meeting legislative and regulatory requirements.
Parent Service(s)	Adult Services (sv)
Lead Cabinet Member(s)	Cabinet Member for Social Services





Existing Arrangements to Manage Risk

Governance	<ul style="list-style-type: none"> Newport City Council is consistently reviewing and monitoring the provision of residential and non-residential care providers in the city and across the region. Regular Directorate and Service area meetings are held including representatives from Finance to assess and forecast the Council's financial position. Extensive work being undertaken regionally and nationally to support providers and to explore alternative models of provision. This includes Welsh Government officials and is linked to extensive focus and work with health colleagues to explore care in hospital settings and the need to provide community based care.
Internal Controls & Processes	<ul style="list-style-type: none"> The Council undertakes regular monitoring and assessment of placements and care packages across Adult Services. The Commissioning team are in weekly if not daily contact with providers in order to support packages of care. Similarly staff from the teams are in very regular contact with residential providers including links with Care Inspectorate Wales. The Council's financial monitoring and reporting of care provision is also undertaken monthly. Contract management arrangements are in place to manage provision and ensure providers meet necessary requirements, standards and provide value for money.
Other Arrangements	<ul style="list-style-type: none"> The focus on this area of work is extensive including external monitoring.

Direction of Risk

	DoR	Comment
Stability of Social Services Providers	➔	Since the beginning of the year, the stability of care providers has improved. However, the risk remains at the same score as we approach the autumn / winter period where we are planning for workforce and service demand pressures.

Risk Mitigation Action Plan

Mitigating Action	Start Date	Target Date	Estimated Completion Date	Performance
 Collaborate with residential/dom care providers to ensure fair & sustainable costs are maintained	01 Oct 2022	31 Mar 2024	31 Mar 2024	★
 Increase the provision of accommodation for adults with learning disabilities.	01 Oct 2022	31 Mar 2024	31 Mar 2024	★

Welsh Government's Net Carbon Zero Target by 2030

Risk Overview	Welsh Government has set a target for all public sector bodies to be net zero carbon by 2030. To achieve this target, NCC has a Climate Change Plan 2022-27 to deliver key actions and projects.
Parent Service(s)	Environment & Public Protection (sv)
Lead Cabinet Member(s)	Cabinet Member for Climate Change & Bio-diversity










Existing Arrangements to Manage Risk

Governance	<ul style="list-style-type: none"> The Climate Change Plan is overseen by the Climate Programme Board. Six subgroups are in place to lead on each of the themes which reports to the Climate Programme Board. Strategic Director (Environment & Sustainability) is the chair of the Climate Programme Board and lead officer of the Climate Change Plan. Strategic Director (Transformation & Corporate) is Deputy Lead and Vice Chair.
Internal Controls & Processes	<ul style="list-style-type: none"> Quarterly reports are reported to the Programme Board and Cabinet Member and half yearly reports are reported to Overview and Scrutiny Management Committee. An Annual Report which includes council carbon emissions is reported to Cabinet each year. Action plans are reviewed on an annual basis to agree work for the following year.
Other Arrangements	<ul style="list-style-type: none"> The council is working with partners to implement the Local Area Energy Plan which is the route map to a carbon net zero energy system by 2050 for the whole of the local authority area. The council is also working with One Newport partners to develop a Newport-wide strategy.

Direction of Risk

	DoR	Comment
Welsh Government's Net Carbon Zero Target by 2030	➔	No significant change from last period.

Risk Mitigation Action Plan

Mitigating Action	Start Date	Target Date	Estimated Completion Date	Performance
 Accelerate the roll out of access to Electric Vehicle charging for residents (CCP & LAEP)	01 Apr 2022	31 Mar 2024	31 Mar 2024	★
 Engagement with Newport's industrial cluster to decarbonise (CCP & LAEP)	01 Apr 2022	31 Mar 2024	31 Mar 2024	★
 Identify and apply for funding to support actions across the Climate Change Plan.	01 Apr 2022	31 Mar 2024	31 Mar 2024	●
 New buildings net zero and retrofit existing buildings (Climate Change Plan)	01 Apr 2022	31 Mar 2024	31 Mar 2024	★
 PPT support the Council's Climate Change Plan delivering Our Buildings, Our Land and Procurement	01 Oct 2022	31 Mar 2024	31 Mar 2024	★
 PPT supporting the Council's Climate Change Plan delivering its Strategic themes	01 Oct 2022	31 Mar 2024	31 Mar 2024	★
 Support Cardiff Capital Region work on regional Domestic Energy Efficient schemes (CCP & LAEP)	01 Apr 2022	31 Mar 2024	31 Mar 2024	★
 Support reducing transport emissions and develop integrated network (Climate Change Plan)	01 Apr 2022	31 Mar 2024	31 Mar 2024	★
 Support reduction in emissions of goods and services the Council procures (Climate Change Plan)	01 Apr 2022	31 Mar 2024	31 Mar 2024	★
 Support to improve organisation Climate Change Culture & Leadership	01 Oct 2022	31 Mar 2024	31 Mar 2024	★



Report

Cabinet

Date: 13 September 2023

Subject **Climate Change Plan Annual Report**

Purpose To review progress and approve the council's organisational Climate Change Plan Annual Report

Author Programme Manager – Climate Change

Ward All wards

Summary Climate Change is one of the defining global challenges of our generation and there is an urgent need for the world to decarbonise, to limit global temperature rise and avert the worst impacts of climate change.

Newport City Council Climate Change Organisational Plan sets out themes, priorities, actions and milestones that we need to take as a Council over the next five years to:

- Reach net zero as an organisation by 2030.
- Review the services we provide to ensure they support the city's journey to net zero and adaptation to climate change.

Delivery of the plan commenced in April 2022 and this report covers:

- Projects that have taken place in 2022-23.
- Annual carbon emissions data for us as a council.

Proposal **To review progress and approve the attached Annual Report.**

Action by Cabinet

Timetable As set out in the plan

This report was prepared after consultation with:

- Cabinet Member for Climate Change & Biodiversity
- Overview & Scrutiny Management Committee
- Chief Financial Officer
- Monitoring Officer
- Head of People, Policy & Transformation

Signed

Background

Climate Change is one of the defining global challenges of our generation and there is an urgent need for the world to decarbonise, to limit global temperature rise and avert the worst impacts of climate change.

There is also a need for the world to adapt to the impacts of climate change now and in the future. The accumulating impacts of climate change including rising sea levels, poor air quality and extreme weather events are already putting many people at risk both locally and across the globe.

In November 2021 the Council proposed a political motion and declared an Ecological and Climate Emergency.

As part of the declaration Council agreed to:

- Continue the good work that we have started and reduce our carbon emissions to net zero carbon by 2030.
- Review the services we provide to ensure they support the city's journey to both net zero carbon and adapting to the impacts of climate change by 2050.
- Develop a clear Climate Change Organisational plan, in consultation with our citizens, for the next five years that will set out the actions we need to take to achieve this.

In March 2022 Cabinet agreed the council's organisational climate change plan for the next five years (2022-27). The plan was developed in collaboration with staff and managers across the council and the involvement of the public.

The Plan

The Aim of the plan is to:

- Reach net zero as an organisation by 2030.
- Review the services we provide to ensure they support the city's journey to net zero and adaptation to climate change.

A consultation draft of the plan was developed by staff and managers across the council using the [Route Map for Decarbonisation Across the Welsh Public Sector](#) as a framework.

The consultation draft of the Climate Change Plan was presented to the Overview and Scrutiny Management Committee in October 2021 and a public consultation period took place in November and December 2021. All responses were reviewed, and the Plan was amended accordingly.

The Plan sets out six key delivery themes: These are:

- Theme 1: Organisational Leadership & Culture
- Theme 2: Our Buildings
- Theme 3: Our Land
- Theme 4: Transport & Mobility
- Theme 5: The Goods & Services we Procure
- Theme 6: Our Wider Role

Each of the delivery themes sets out a 2030 vision, set of priorities, actions and milestones that we need to take over the next five years.

Delivery of the plan commenced in April 2022 and it was agreed that a progress and review report would be published annually. The delivery of the report was agreed as being in September each year as this allows us to include data on our annual carbon emissions which is not available until this time.

Financial Summary (Capital and Revenue)

The Climate Change Plan will change the way we make spending decisions in the future. The Plan sets out a financial commitment to plan for the financial impacts of climate change, and to ensure that our medium to long term financial planning contributes to the delivery of the Council's commitment to reduce carbon emissions where possible.

- Climate change and carbon reduction initiatives are to be considered within the council's long term capital programme, revenue budget and medium-term financial plan, whilst also maximising the use of external funding where possible.
- Appropriate sources of external funding and innovative use of internal funds to drive the change required are to be explored, to achieve our aspiration to become net zero carbon by 2030.
- All business cases for the transformational change programme and projects are to consider carbon reduction financial and non-financial impacts.

Risks

Risk Title / Description	Risk Impact score of Risk if it occurs* (H/M/L)	Risk Probability of risk occurring (H/M/L)	Risk Mitigation Action(s) What is the Council doing or what has it done to avoid the risk or reduce its effect?	Risk Owner Officer(s) responsible for dealing with the risk?
That the plan is not considered as an overarching plan of the council and is not aligned with the Corporate Plan and the strategic direction for the organisation	Medium	Low	All services need to be engaged in the implementation of the plan. When the next Corporate plan is developed Climate Change mitigation and adaptation should be considered as an underpinning principle. The delivery and governance of the climate change plan and the corporate plan must be aligned.	Strategic Director, Transformation & Corporate
Short term planning instead of longer term working as part of the Climate Change Plan	Medium	Medium	Services are required to consider the long-term impact when making decisions as part of the WFG Act.	Strategic Director, Transformation & Corporate
Insufficient resources & funding	High	Medium	Climate change and carbon reduction initiatives to be considered within the council's long term capital programme and revenue budget and medium-term financial plan, whilst also maximising the use of external funding where possible.	Strategic Director, Environment & Sustainability Strategic Director, Transformation & Corporate

* Taking account of proposed mitigation measures

Links to Council Policies and Priorities

Limiting climate change and reducing our carbon emissions are key to achieving all our well-being objectives and the well-being goals. If we don't continue to reduce our carbon and tackle climate change our well-being objectives and the well-being goals will be difficult if not impossible to realise.

Options Available and considered

- 1) To review and approve the Climate Change Plan Annual Report.
- 2) Not to approve the Annual Report

Preferred Option and Why

Option 1 - To review and approve the Climate Change Plan Annual Report.

The report reviews progress made against our commitments in the Climate Change Plan to enable the council to work towards reaching net zero as an organisation by 2030 and review the services we provide to ensure they support the city's journey to net zero and adaptation to climate change.

Comments of Chief Financial Officer

The annual report describes the action plan that has been implemented a number of projects and initiatives that have already begun and, in some cases, already completed. These schemes have been funded through the use of existing revenue and capital budgets or various grants.

As the Climate Change plan continues to progress it will be critical to continue to monitor and report on the financial impact. A key part of this will be to identify the financial impacts of the implementation of the Council's agreed "organisational climate change plan for the next five years (2022-27)". That work continues to be on-going and it's important this is completed as it's a key underpin to deliver the Climate Change plan. Inevitably, significant external funding will be required to progress some aspects of the plan as well as funding investment and re-allocation of existing budgets in the NCC budget.

As well as the impact upon revenue and capital budgets, the Council will also need to consider the carbon impact of its treasury management and procurement activities. In the case of treasury management, consideration will need to be given to the investments the Council makes and ensuring that, wherever possible, investments are ethical and contribute towards the reduction of CO2 emissions across the globe.

In the case of funding sources, as outlined in the report, the Council will need to be innovative in identifying funding sources to support the capital investment required, as well as ensuring the maximisation of external grant funding for carbon reduction initiatives. In the case of procurement activities, the Council will need to review its supply chains and look for opportunities to reduce the carbon footprint of its external contracting activities by working with partners and identifying ways to incentivise good practice amongst suppliers.

Comments of Monitoring Officer

There are no legal issues arising from the report, as this is a non-statutory plan. However, the Climate Change Organisational Plan is consistent with the Council's strategic corporate and well-being and carbon reduction objectives, and the Ecological and Climate Emergency declaration passed at full Council. Any legal issues will be addressed as part of the delivery of the individual actions within the Plan.

Comments of Head of People, Policy & Transformation

The report asks Cabinet to review and approve the first Climate Change Plan Annual Report. The report notes progress made against our commitments in the Climate Change Plan to enable the council to work towards net zero as an organisation by 2030 and reviews the services we provide to ensure they support the city's journey to net zero and adaptation to climate change.

A full FEIA was undertaken on the Climate Change Plan 2022-27, to which this annual report relates. The FEIA considered our legislative responsibilities under the Equality Act 2010, including the Social-economic Duty, and the Well-being of Future Generations (Wales) Act 2015, and Welsh Language (Wales) Measure 2011. A consultation was also undertaken on the draft Climate Change Plan in 2021 and the Annual Report was presented to Overview and Scrutiny Management Committee on 28 July 2023 to gather comments and recommendations, with amendments made to the report.

There are no direct HR implications associated with the report.

Scrutiny Committees

The Annual Report was presented to the Overview and Scrutiny Management Committee on 28th July 2023. The Committee made the following comments and recommendations:

- The Committee asked for an exercise to be completed wherein the new changes to the measurement of supplier emissions be applied to previous years' data to better understand trends and changes – this has been completed and has been added to the report
- The Committee recommended that data on 3 weekly garden waste collections' impact on recycling waste be included in next report.
- The Committee recommended that lists of bus shelter improvements be shared more widely with Members and the work programme of these improvement be shared with Ward Members so residents can be informed.
- The Committee recommended a survey be carried out to ascertain in which areas would improvements to bus shelters encourage bus usage.
- The Committee recommended that monitoring be carried out to ascertain how often those in the Cycle to Work Scheme use their bicycles to travel to work.
- The Committee recommended that Red, Amber and Green RAG ratings have a commentary/explanation column added to the report – this has been added to the report

Fairness and Equality Impact Assessment:

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

A full Fairness and Equality Impact Assessment (FEIA) was undertaken on the Climate Change Plan 2022-27, to which this Annual Report relates. This FEIA considers our legislative responsibilities under the Equality Act (2010), including the Socio-economic Duty, the Wellbeing of Future Generations (Wales) Act (2015) and the Welsh Language (Wales) Measure (2011). Therefore, no FEIA has been completed for this annual report.

Consultation

The consultation draft of the Climate Change Plan was presented to the Overview and Scrutiny Management Committee in October and a public consultation period took place in November and December 2021.

Background Papers

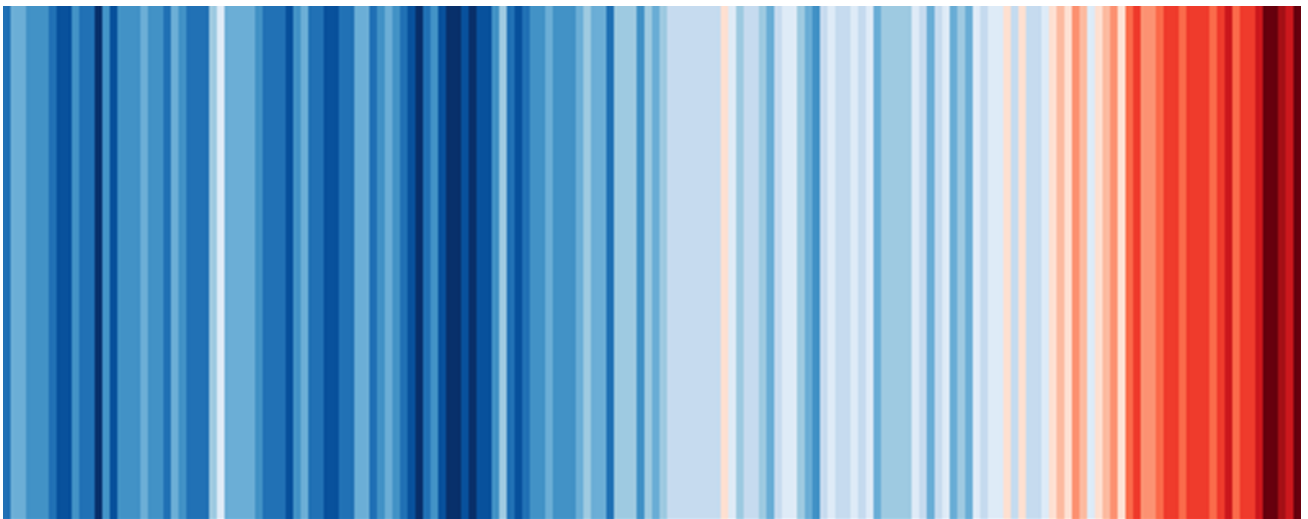
[Climate Change Plan 2022-27](#)

[Climate Change Plan Animation - YouTube](#)

Dated: 5 September 2023

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Newport City Council Organisational Climate Change Plan 2022-27 Annual Report 2022-23



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

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1 FOREWORD

To be added



*Councillor Jane Mudd
Leader of the Council*



*Councillor Yvonne Forsey
Cabinet Member for Climate
Change & Biodiversity*

2 BACKGROUND

The Newport City Council Organisational Climate Change Plan runs from 2022-27. This is our annual report for 2022-23.

2.1 Ecological & Climate Emergency

In November 2021 the council declared an Ecological and Climate Emergency which specified that a clear Organisational Climate Change plan would be developed, in consultation with our citizens.

2.2 Climate Change Plan 2022-27

In March 2022, the council's Cabinet agreed our [Organisational Climate Change Plan 2022-27](#) that sets out the themes, priorities, actions, and milestones that we need to take as a council over the next five years to:

- Reach net zero carbon as an organisation by 2030.
- Review the services we provide to ensure they support the city's journey to net zero and adaptation to climate change.

This is a key document for the council and will shape our council's climate change mitigation and adaptation journey over the next five years. An [animation](#) gives an overview of the plan.

2.3 How was the plan developed?

A Climate Change Pro Board was set up to lead on the development of the plan. Staff and managers from across the council were involved in writing of a consultation draft of the plan using the [Route Map for Decarbonisation](#) as a framework.

A public consultation took place in November and December 2021. All responses were reviewed, and the plan was amended accordingly.

2.4 Aims of the plan

The plan sets out the delivery themes, priorities, actions, and milestones that we need to take as a council over the next five years to:

- ***Reach net zero carbon as an organisation by 2030.***
- ***Review the services we provide to ensure they support the city's journey to net zero and adaptation to climate change.***

2.5 Key Delivery Themes

To deliver our plan six delivery themes were identified similar to the those in the [Route Map for Decarbonisation](#).

The delivery themes are:

<i>Theme 1</i>				
<i>Organisational Culture & Leadership</i>				
<i>Theme 2</i>	<i>Theme 3</i>	<i>Theme 4</i>	<i>Theme 5</i>	<i>Theme 6</i>
<i>Our Buildings</i>	<i>Our Land</i>	<i>Transport & Mobility</i>	<i>The Good & Services we Procure</i>	<i>Our Wider Role</i>

The delivery themes are all interdependent and have interconnected and overlapping relationships, with Theme 1 as an overarching theme.

2.6 Delivery of the Plan

Six subgroups were set up to manage delivery of projects relating to the Plan. Each group is chaired by a Strategic Director or Head of Service and attended by relevant officers across a range of service areas. The sub-groups meet every 3 months to discuss progress against the action plan for their theme and to share updates and best practice.

A Climate Change Programme Board was also set up, chaired by the Strategic Director for Environment and Sustainability and attended by the Chairs of the six themes, plus representation from our Public Relations team. The Board advise on strategic issues relating to climate change policy within the Council and provide performance management for the action plans for the six themes.

Progress against the Year 1 action plans for each of the six themes can be found as an appendix to this report.

3 DEVELOPMENT OF YEAR 2 ACTION PLANS

It was important to us to refresh and amend the action plans for Year 2 of the Plan for a number of reasons. Firstly, the development of the Newport Local Area Energy Plan (LAEP) (a Newport-wide plan) provided a much clearer distinction between actions which would support our decarbonisation as an organisation, which would fall under the Organisational Plan, and actions which would support the decarbonisation of the wider city, which would fall under the LAEP. Secondly, we identified that the core of the Plan needed to shift from a focus on actions which supported general awareness-raising and development of processes and policies that would support our organisational decarbonisation to a focus on specific projects that would have a measurable impact on our emissions. Thirdly, there was an appreciation that the Year 2 Action Plans were an opportunity to rationalise and streamline the actions to improve performance reporting, particularly in light of the move to MiHub for reporting.

We have also taken the opportunity to review some of the priorities associated with each theme, with some being removed (especially those which have a strong overlap with the LAEP), some being added and some being amended in light of our experience of delivering the Year 1 Action Plans.

The Wider Role theme was particularly impacted by the changes brought about as a result of the development of the LAEP. As can be seen in Appendix A, the majority of the priority areas within this theme have either been moved to other themes (as in the case of Flooding, which has now moved to the Land theme as it was thought that there was greater potential for collaboration with this group) or removed entirely (for example in the case of Placemaking and Building Control which will now be considered under the LAEP).

The Climate Change Programme Board have also recommended the removal of Action Plans from the Organisational Plan. The Year 2 Action Plans will still be made publicly available, but removing them from the body of the Plan itself means that the Plan does not need to be amended on an annual basis.

Year 2 Action Plans for the six themes can be found as an appendix to this report.

4 PERFORMANCE

While more detailed information on the different actions as part of 22/23 Action Plan has been included in Appendix 1, this section provides an overview of the progress made for each delivery theme, including specific examples and projects to highlight the work carried out during the past year, and the main priority areas to work on during 23/24.

Key:

Colour ¹	Description
	Progress against the theme / priority on track vs expectations (no issues)
	Progress against the theme / priority has been made but some aspects behind schedule
	Progress against the theme / priority has yet to be made, is severely behind where expected in all or most areas. The project is at risk.

¹ Thresholds to clearly define the progress against each theme / priority will be included within the next annual report.

4.1 Theme 1: Organisational Culture & Leadership

2030 Vision	<i>The climate and nature emergency will be at the heart of all our work. In our decisions we will take positive action to minimise climate and ecological impacts. We will lead by example and empower our partners, communities, and individuals to tackle the climate emergency and prioritise nature-based solutions</i>	A
Priorities	Behaviours & Role-Modelling: Our elected members and workforce will be encouraged and supported to consider their individual contribution to becoming net zero carbon by 2030, and leaders will role model the council’s expectations.	A
	Governance & Performance: Our democratic and corporate functions will be committed to becoming net zero carbon by 2030, and our decision-making, governance framework and performance monitoring will reflect this commitment.	A
	Promotion & Engagement: Regularly publicise progress and achievements to embed aspirations to be net zero carbon by 2030.	A
	Financial Commitment: To plan for the financial impacts of climate change, and to ensure that our medium to long term financial planning contributes to the delivery of the council’s commitment to reduce carbon emissions where possible	A

Progress against this theme has generally been good, but there are a few key actions that have not yet been completed (changes to report template, improvements to internal and external communications and confirmation of the funding model for energy efficiency projects) that mean that overall progress against the theme is Amber. However, as can be seen from the specific examples below, excellent progress has been made on training, the corporate plan and the staff network, along with a more general improvement in the visibility of Climate Change considerations within the Council as a whole.

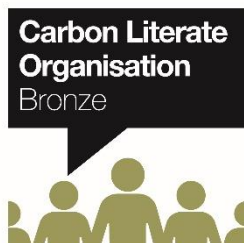
4.1.1 Projects update

A. Cabinet Member

In May 2022, following Local Government elections, the new Cabinet was announced, with Councillor Yvonne Forsey being appointed as Cabinet Member for Climate Change and Bio-diversity. This is the first time that Newport has appointed a Cabinet Member with this specific portfolio and is a strong indicator of the seriousness with which the Administration views Climate Change and the role of the Council in responding to it. The Cabinet Member has been a key advocate for Climate Change policy

across the Council and her representation at Cabinet level has been crucial in ensuring that Climate Change is properly represented in the decision-making process.

B. Carbon Literacy Training and Accreditation



Carbon literacy training provides an awareness of the carbon dioxide costs and impacts of everyday activities and the knowledge to enable the reduction of emissions as an individual, community and organisational basis.

Over the past year, the Leader, Chief Executive and all Cabinet Members, Strategic Directors and Heads of Service have undertaken Carbon Literacy training as well as over half of our elected Members.

We are delighted to have been awarded Bronze Accreditation Status by the Carbon Literacy Project and are planning to work towards Silver Accreditation status, which will require a much wider rollout of the training across the organisation. To support this, colleagues in our Adult Learning Team have been trained in how to deliver the sessions, which will allow us to provide training at a much lower cost, as well as to be able to support community organisations who wish to complete the training.

C. Corporate Plan

Following the local elections in May 2022, the Council undertook extensive work to develop its new Corporate Plan for the next 5 years. In the development of the Corporate Plan we engaged with officers through a series of workshops to understand our priorities and the priorities of our citizens and businesses over the next 10 to 20 years. Across the five workshops the environmental, ecological opportunities and risks were considered and how they will impact on the delivery of our services and citizens in the city. Additionally, through the development of the Climate Change plan, we were also able to integrate the engagement and development work of the Climate Change Plan.

Through this work, the Corporate Plan integrated the priorities of its Climate Change Plan, specifically within Well-being Objective 2 Environment and Infrastructure of the city and Well-being Objective 4 an Inclusive, fair and sustainable Council. Within these objectives we have several strategic priorities focused on our external work to enhance and protect Newport's ecological environment and internal work for Newport Council to meet its Climate Change target to be net zero carbon by 2030. All of this work is aligned to the Welsh Government's policy and the Well-being of Future Generations Act goals. Further information on the Corporate Plan can be found [here](#).

D. Staff Network



One of the key actions in the Organisational Culture and Leadership theme was to set up a Climate Change Staff Network to encourage staff members from across all service areas to contribute to the development of Climate Change policy and practice and to provide a forum for interested individuals to pursue projects outside of their day to day roles.

The Network first met in January 2023 and has appointed a Chair and Vice Chairs. The Network has already developed and launched a staff Travel Survey which will provide vitally important data to support the decarbonisation of our staff commuting and business travel.

4.1.2 Next Steps

The main priorities for this theme over the next 12 months are:

- Update reporting and finance templates to encourage and promote inclusion of climate change/decarbonisation as a factor in decision-making
- Embed carbon literacy/climate change in training provision for all staff, including provision of mandatory training/e-learning
- Development of internal and external communications plan for Climate Change to ensure that we are communicating with and engaging staff and the general public

4.2 Theme 2: Our Buildings

2030 Vision	<i>To achieve net zero carbon energy and support the nature recovery across our buildings by 2030</i>	A
Priorities	New Council Buildings: All new building to be net zero carbon.	A
	Building Retrofitting: Deep retrofit to ensure creating net zero carbon energy buildings.	A
	Renewable Heat: Implementation of renewable heat in new buildings.	A
	Natural Gas: A commitment to significantly reduce or remove natural gas heating across our buildings.	A
	Building Rationalisation: Audit current assets to understand their long-term carbon impact with the aim of better strategic utilisation.	A

Decarbonising our buildings remains one of the biggest issues in reducing our organisational emissions. Good initial progress has been made in this area but the funding challenges are considerable and the age and diversity of our estate means that decarbonising heat is a particular issue as the level of retrofitting that would be required at some sites to make them suitable for the deployment of Air Source Heat Pumps is extensive. The energy crisis has also had a huge impact in this area as it has dramatically altered the business cases for the deployment of Air Source Heat Pumps. However, the Council has made investments in staff resource in this area, with the Carbon

Reduction team going from 2.2 FTE at the beginning of the year to 5.2 now, which will allow the team to support more projects over the coming year.

4.2.1 Projects update

A. Egni Solar Co-op

Egni Co-op develops rooftop solar energy in Wales and has over 4.5MWp of capacity on 88 sites, including schools, community buildings and businesses and also provide an educational outreach for schools. They have previously provided, and continue to provide maintenance support, for a number of sites across Newport, including Bassaleg Comprehensive School, Caerleon Comprehensive School, Eveswell Primary School, Maesglas Recycling Centre and the Geraint Thomas Velodrome. This year they have installed the following across our estate:

- Ysgol Gymraeg Bro Teyrnnon - 35kWp
- Alway Primary School - 55kWp
- Llanmartin Primary School - 56kWp
- St Julian's Primary School (Extension) - 30kWp

This has taken the total number of NCC buildings with solar PV installed up to 39.

Egni Cooperative also facilitate the programme, *We are Energy Warriors*, at 5 NCC schools. The project engages pupils in climate change & energy reduction learning. Through a series of bilingual workshops, they are empowered to take action to reduce energy consumption. Partnered with Energy Sparks, schools are able to analyse and investigate their energy and solar data through this educational platform and take part in additional activities to become explorers, analysts, detectives and changemakers!

B. Asset Rationalisation Programme

The asset rationalisation programme aims to optimise the use of the Council estate, release capital receipts from surplus assets and make best use of limited maintenance budgets. This is supported by commitments within the Corporate Plan and Council's Climate Change Plan.

As part of this work, the project board has developed a set of principles to support the decisions within this programme, and for our ongoing asset management plan. These principles also set out the core objectives for the programme within the new Strategic Asset Management Plan 2023-2027 and will include:

The Strategic Asset Management Plan places social value, fairness and sustainability at its core:

- NCC Assets should be fit for purpose, in the right location, occupied by the right services and being delivered by the right teams
- We must understand the needs of our communities; through consultation and engagement to understand where we might need assets in the future
- We will be a data and intelligence driven organisation, which will be an underpinning driver for any asset rationalisation proposals. We must adopt clarity and consistency in approach supported by robust data.

- Retained assets must run as effectively and efficiently as possible, with appropriate budgets assigned, working with our partners and meeting the requirements of the Council's Climate Change Plan.
- NCC future asset liabilities must be safeguarded when disposing of assets and decisions will consider social value e.g. through Community Asset Transfer (CAT), lease etc.

C. LED Lighting

Over the course of 2022/2023, Newport City Council's Carbon Reduction Team worked with Newport Norse to implement LED Lighting upgrades across 8 sites, including 4 secondary schools and 4 primary schools, with combined projected annual carbon savings of 125.4 tonnes CO₂e. This is the equivalent to circa 3% of the total carbon emissions associated with NCC's electricity emissions from Buildings.

These schemes were implemented to save revenue, reduce carbon in support of the council's climate change commitments, reduce the running and maintenance costs associated with site lighting, reduce electrical loading on site, and improve the quality and user experience of the schools.

The projects were instigated by the Carbon Reduction Team and were developed in conjunction with Newport Norse. The installations were delivered by Newport Norse and their trusted contractors.



1. *Caerleon Comprehensive and Regional Pool and Tennis Centre Air Source Heat Pumps*

Following on from low carbon heat installations in 2021/2022, NCC secured a further £510,000 of Low Carbon Heat Grant funding, to retrofit air source heat pumps to existing sites to reduce gas usage and therefore carbon emissions.

2. *Low Carbon Heat Designs*

12 sites had low carbon heat designs undertaken on them in anticipation of Welsh Government Grant applications in 2023/2024.

3. *Refit*

Commencement of a £2 million pound REfit Programme, delivering decarbonisation measures across 14 sites, due for completion at the end of 2023/2024.

4.2.2 Next Steps

The main priorities for this theme over the next 12 months are:

- Asset Rationalisation Programme – support the work of the Asset Rationalisation Programme Board to ensure that decarbonisation is part of the decision-making process when determining the future use of the estate
- Produce a cost estimate for decarbonisation of the estate
- Deploy the New Buildings Policy to identify minimum standards for new builds
- Draft and adopt an operational energy policy to support energy efficiency

4.2. Theme 3: Our Land

2030 Vision	<i>A city which sustainably manages and increases its natural resources, protecting, enhancing, improving and connecting the natural environment in a carbon neutral and climate and ecological responsible manner</i>	G
Priorities	Ecosystem Resilience: Sustainably restore, create and connect biodiversity and habitats by improving council owned land and public realm.	A
	Trees & Woodland: Improve human health, environmental quality, carbon reduction and capture by sustainably managing and increasing Newport’s trees and woodland.	G
	Urban Greenspace: Increase green infrastructure in the urban/public realm to reduce environmental inequalities, for the multiple benefits of nature’s recovery, human health and wellbeing, climate adaptation, cooling and flood alleviation, providing carbon reduction and clean air.	G
	Council Owned Leased Land: Support the nature recovery whilst reducing carbon emissions from council owned farmland and any other leased land.	A

There has been very positive progress in this theme, with tree planting and the development of Green Infrastructure two notable successes, as can be seen in the case studies below. Moving forward, we are looking to take a much more strategic approach to the development of our land assets, supported by the Asset Rationalisation Programme (see above) and the key action referenced below, the Climate Change Audit to assess the potential of our land for developments such as tree planting, solar farms, flood defences, Green Infrastructure, etc.

4.3.2. Projects update

A. Tree City of the World



Newport Council has received Tree City of the World status, a programme run by the Arbor Day Foundation and the Food and Agricultural Organisation (FAO) of the United Nations.

The programme is an international effort to recognise cities and towns committed to ensuring that their urban forests and trees are properly maintained, sustainably managed, and duly celebrated.

The council was recognised for its management of the city’s tree stock. This includes having policies in place for maintaining trees, as well as its work managing the impact of ash dieback disease, which has impacted trees at a number of sites in the city.

The council was also recognised for its green canopy planting ceremonies back in March 2022. All schools in the city were invited to plant a tree as part of the platinum jubilee celebrations for Queen Elizabeth II, with special ceremonies taking place at five schools.

An avenue of trees was also planted in Tredegar Park, with 80 trees being installed alongside the active travel route which runs through the park.

B. Bee Friendly Newport – Nature Isn’t Neat



Newport is an official Bee Friendly City accredited by Welsh Government. Over the last 4 years Newport City Council has made significant changes to how it manages it’s roadside verges, grasslands and green spaces. Increasing the area managed for biodiversity year on year. Supported by Welsh Governments Local Places for Nature Grant and taking part in initiatives such as No Mow May and Nature isn’t Neat. Nature isn’t Neat is a Gwent Green Grid project that aims to raise awareness about the importance of pollinators

across the Greater Gwent Authorities, the actions that we can all take to support them, and how these can have a positive impact on other important issues such as reducing the decline in other wildlife and mitigating the impacts of climate change. Newport City Council currently manages 45 hectares of grassland for biodiversity including locations such as High Cross Open Space, Allt-yr-yn Local Nature Reserve and 19 Hills Ringland, and approximately 30 Hectares of other grassland such as road side verges and small green spaces in residential areas.

C. Green Infrastructure

Following a number of pilot projects last year to develop Green Infrastructure (GI) projects across the City, including the commissioning of an assessment into suitable locations for GI within the City Centre, Newport Council were successful in a bid, in collaboration with Natural Resources Wales, from the Welsh Government Asset Collaboration Fund for detailed designs for four developments taken from the City Centre Green Infrastructure (GI) feasibility study - Charles Street, Hill Street, George Street Bridge Approach West CC10 and Riverside Walkway, with Riverside Walkway being developed currently.

Greening and installing enhanced planting have multiple benefits, including benefits to a sustainable economy. Green Infrastructure increases biodiversity, provides benefits to people’s health and wellbeing, helps cool the city alleviating heat island effect, and makes the city more visually appealing attracting more people to city centre businesses.

D. Newport Otter Project

Funded by the Gwent Green Grid, we have been working with a local Otter expert to enhance and protect otters along a stretch of one of our rivers (protected location). Under the guidance of NRW and our expert we sited up the banks with the addition of whips and trees, and selected 2 locations to build otter holts. Rather than plastic or concrete holts available to purchase, wood from recently felled trees was used in the form of hollow logs as this would be a good solid structure almost prefabricated by nature. Once built, the holts were hidden, and further work took place to secure the area and protect from disturbance by walkers and dogs.

4.2.3 Next Steps

The main priorities for this theme over the next 12 months are:

- Climate Change audit for our land portfolio – identifying suitability of all of our land assets for solar PV, tree planting, flood prevention, rewilding, etc.
- Plant 5,000 trees
- Green infrastructure – improvements to city centre through introduction of green infrastructure at five locations
- Pocket parks – development of three pocket park sites
- Development of Sustainable Urban Drainage (SUDS) Strategy

4.4 Theme 4: Transport & Mobility

2030 Vision	<i>A city with healthy and sustainable travel choices for the people</i>	A
Priorities	<p><u>Council Emissions</u></p> <ol style="list-style-type: none"> Business (Grey) Mileage & Staff Commuting: Reduce carbon emissions from employee commuting and grey mileage by implementing a policy of agile working, active travel and usage of public transport and ultra-low emissions vehicles (ULEVs). Fleet: Reduce council carbon emissions by moving to a ULEV fleet. 	A
	<p><u>Wider Role</u></p> <ol style="list-style-type: none"> Transport Network: Managing the transport network to enable people to travel in a more sustainable way. RAG (Green) Land Use Planning & Placemaking: Ensure sustainable transport options are available from the outset in all new developments, including walking, cycling, public transport and electric charging infrastructure. RAG (Amber) Active Travel: Reduce carbon emission by prioritising active travel across the city. RAG (Amber) Public Transport: Encourage the use of public transport instead of car usage. RAG (Green) Charging Point Infrastructure: Increase charging capacity across the city. RAG (Green) Schools: Reduce carbon emissions from home to school travel. (Amber) Taxis: Implement policies to support the move to a low emission taxi fleet. (Red) 	A

Progress in the Transport theme has been good but, as with the Buildings theme, the biggest challenges lie ahead, both from an organisational perspective (most of the ‘low hanging fruit’ for fleet electrification has already been dealt with, leaving the more complex and/or costly replacements) and for the City as a whole which will be dealt with through the LAEP (the infrastructure and behaviour change projects required to reduce emissions in a meaningful way). The development of EV charging infrastructure has been a particular success story this year, with further funding having been made available to us from Welsh Government for the next two years.

4.4.1 Projects update



A. Plant & Fleet Vehicles

Currently, NCC own 48 cars and vans, of which 30 are fully electric (62.5%). Additionally we hire 31 cars and vans, 100% of which are fully electric.

B. Active Travel

Through the Welsh Government's Active Travel Fund a number of new active travel projects have been delivered to increase the availability of good quality cycling and walking routes across the city area.

Project delivery has been focussed on areas where demand for intervention is demonstrated through public consultation. This often emphasises the lack to good quality provision for walking and cycling away from busy roads and junction crossings. This demand supported by the results of previous active travel network consultations shows the potential to address the issues through the provision of routes through parks and open spaces. This approach improves the sense of safety, creates a more pleasant environment for the user and can also provide more direct routes when compared with on-road alternatives.



The new **Devon Place bridge** provides much improved connectivity for both pedestrians and cyclist moving between the north and south of the city centre. The connecting route between the two destinations was previously served by an underpass which is unfit for purpose. The bridge connects the Gold Tops and Queens Hill area to the city centre without the need to use the underpass. The bridge opened this year and has been built to active travel standards, enabling easy use for wheelchair users, cyclists and walkers. The scheme also includes improved paving around the transport hub and incorporates sustainable drainage features that capture rainwater and divert it to the newly installed planters.

Surface improvement taking place at **Malpas & Bettws Canal** to bring this route up to active travel standard along the section of the canal between Gwastad Gate and the boundary with Torfaen have been completed.

Lighting and benches were installed along the **Gaer Fort** route completing this project.

After several rounds of public consultation, the Active Travel Network maps review has been completed and the updated map of active travel routes (both existing and proposed routes) and final report have been approved by Welsh Government. The map routes within in it will be used to plan future active travel developments over the next five years and funding has been applied for based on these plans for projects to be delivered in 2023/24.

C. Solar Farm at Docksway Household Waste Centre

A feasibility study has been completed for a 1.5MW solar array at Docksway household waste centre. A connection has been agreed with Western Power Distribution and planning approval is in progress. When built, this array will provide power for the charging hub at Docksway which charges our fleet of electric refuse vehicles.

D. Charging Points



Our draft EV Charging Strategy is currently out for public consultation and will be published in the coming months. On-street residential fast chargers went live at nine locations across Newport last year targeting areas with low availability of off-street parking. A further 12 chargers have been installed in community car parks for visitor and residential use with the

support of Cardiff Capital Region. 13 additional Council sites have been EV charging enabled. Finally, we successfully bid for Welsh Government funding to deliver a further 15 on-street chargers as well as charging hubs at Kingsway Car Park and Newport International Sports Village in 2023/24.

E. Public Transport

During the last 12 months Newport City Council has continued to support the transition to more sustainable modes of travel and reduce the impact of transport on the climate.

The provision of high quality bus stop infrastructure is vital to attract potential users. Following a successful Local Transport Grant Bid to Welsh Government, a further 30 shelters have been procured, including 11 bee friendly shelters. We have also procured 60 Electronic Timetable displays, which are due to be installed shortly. In accordance with our policy to utilise renewable energy sources where possible, the shelters and electronic displays are solar powered.

In addition, Newport City Council launched its £6.3m Electric Bus Grant funding scheme with support from Welsh Government. The scheme provide support for operators to increase electric bus use in the city. Whilst funding is targeted at bus routes that enter Air Quality Management Areas, there is a significant benefit to wider climate change with the use of vehicles with zero tail pipe emissions.

We continue to work with partners including Welsh Government and the Burns Delivery Unit to develop the infrastructure required to achieve modal shift to active travel and public transport. Public consultation was undertaken on proposals for the A48 / NCN 88 corridor and City Centre provision at Old Green and the Railway Station. The results of these exercises will be inform design proposals.

4.4.2 Next Steps

The main priorities for this theme over the next 12 months are:

- Delivery of EV charging projects supported by Welsh Government funding – 15 on street chargers and rapid hubs at Kingsway Car Park and Newport International Sports Village
- Produce fleet replacement plan and cost of transition to fully ULEV fleet, including specialist vehicles such as refuse vehicles and road sweepers
- Implement fleet charging at Civic Centre
- Develop and implement sustainable travel plans for key Council sites, including schools

4.5 Theme 5: The Goods & Services we Procure

2030 Vision	<i>Sustainable procurement will be at the heart of ensuring that our external contracting minimises the climate and nature impact and also the carbon footprint of goods, works and services procured</i>	A
Priorities	Measurement: Gain a good understanding of our estimated tCO ₂ e per annum from procured goods and services, and its emissions profile and supplier base.	A
	Guidance, Tools and Training: Develop guidance, tools and training for the organisation to support staff to reduction of carbon throughout the procurement lifecycle.	G
	Partnership: Lead by example and work with our procurement strategic partners both public and private to align climate change, carbon reduction and circular economy aspirations.	G
	Engagement: Incentivise suppliers through proportionate evaluation criteria to proactively seek opportunities to reduce carbon and climate impacts.	A

The introduction of specific carbon-reduction criteria into Gateway Level 4 procurement was a major success for this theme, and the research project which began at the end of 2022/23 and which continues into 2023/24 will provide us with invaluable insight into the nature and true extent of our procurement emissions rather than just relying on the Welsh Government model of

calculating emissions which is not always accurate (the categories used to differentiate suppliers are based on average emissions which may not reflect the position of a particular organisation and if suppliers are incorrectly coded in our system then the wrong average values will be used, for example). A greater focus on our procurement emissions also gives us the opportunity for better engagement on decarbonisation with our supply chain. Nearly 70% of our suppliers are local organisations with the Cardiff Capital Region (29.21% within Newport), so any decarbonisation that they undertake will also have a beneficial effect for our local emissions.

4.5.2 Projects updates

A. Changes to Procurement for Gateway Level 4.

The main change undertaken in 2022/23 was the requirement for all procurements above £175k (Gateway Process 4) to consider climate change and implement carbon reduction measures. Strategic Directors and the Gateway Board now have the responsibility to approve large-value contracts exceeding £175k. This process was implemented to reduce the climate impact of our contracts. To support this, the Carbon Reduction Team will collaborate with Senior Responsible Officers (SROs) across all service areas and procurement colleagues to review and propose measures for modifying specifications and implementing necessary actions by suppliers throughout the contract duration, with emissions reduction as the primary focus. The Carbon-focused section of the Procurement Board Gateway Form will undergo review and approval by the Carbon Reduction Team before submission for Board approval, ensuring thorough consideration of all possible scenarios.

B. Procurement Research Project

As procurement represented 51% of our carbon emissions in 2021/22, we were keen to understand more about where these emissions come from and how we can support our supply chain to decarbonise.

Initially, we identified organisations with the highest annual expenditure (41 organisations represent 50% of our annual expenditure) and initiated direct communication with them. Targets were set to inquire about their Carbon Reduction Plans and request emissions data. Large corporations responded promptly and cooperatively, providing valuable information.

Challenges arose when extending outreach to suppliers further down the supply chain. Many lacked carbon reporting experience and were uncertain about expectations. Addressing this provided an opportunity for education and support. We developed a user-friendly emissions reporting toolkit to simplifying the process and accommodate diverse needs. The toolkit was rolled out at the end of 2022/23 and will continue to be refined, ensuring its relevance and up-to-date functionality.

The toolkit includes sections for gathering general information about each organisation, such as services provided and annual turnover. To avoid duplication, organisations are asked for data specific to contracts with us. For those already reporting emissions, a request is made to input Scope 1, 2, and 3 data. Assistance is provided to those not currently reporting. A separate section

captures consumption data (gas, electricity, fuel) with options for annual or monthly reporting. The spreadsheet includes carbon factors to calculate supplier emissions accurately. We have found that the emissions data we receive from our suppliers is significantly lower when compared to the spend-based methods that were previously employed.

4.4.2. Next Steps

The main priorities for this theme over the next 12 months are:

- Continue working with our suppliers to gain accurate data on their emissions and continue to find ways to support them to reduce this
- Extend Gateway Level 4 processes into all Gateway Level 3 procurement
- Focus on Social Services procurement as this represents a high proportion of our annual spend

4.6. Theme 6: Our Wider Role

2030 Vision	<i>Leading by example and proactively supporting our communities and partners towards society wide action for nature and climate recovery</i>	G
Priorities	Placemaking & Building Control: Reduce carbon emissions and support nature recovery by focusing on sustainable, low carbon development, influencing low carbon energy and building resilient communities.	G
	Energy: Identify and implement the changes needed to the local energy system to decarbonise heat, electricity and local transport and realises local renewable energy production.	G
	Flooding: Build climate resilience and alleviate flooding across the city using a range of measures including natural flood defences.	A
	Waste: Reduce carbon emissions from managing waste to become a zero-waste city and nation by 2050.	G
	Digital: Utilise digital solutions effectively to reduce and monitor carbon emissions.	A
	Partnerships & Communities: Work collaboratively with partners and communities to promote the climate and nature recovery across the city.	A

Progress in this area has been generally positive, with the work being undertaken on the Replacement Local Development Plan the area which has the potential to have the biggest impact on our city-wide emissions. The development of the Local Area Energy Plan is also a substantial achievement for this year, although it is not included as a case study below as it has already been discussed above.

4.6.2 Projects Update

A. Replacement Local Development Plan

Work is currently underway on Newport's Replacement Local Development Plan (RLDP). A Local Development Plan shows how land should be used and development should take place in an area over a specified time period. Once a plan is adopted, it informs all planning decisions in an area. The current Local Development Plan was adopted in 2015. It sets out how new development will be managed and land will be used in Newport until 2026.

This plan is reviewed every year. In 2020, it was agreed that a new replacement plan should be prepared. The Climate Change Team have been working with the Planning Policy Team to ensure appropriate representation of Climate Change considerations, including no gas in new developments, biodiversity requirements and prioritisation of renewable energy.

B. Clean Air Day



Newport City Councils Senior Scientific Officer Steve Manning organises an event each year in association with the national Clean Air Day initiative promoted by Global Action Planning. This year schoolchildren were invited to participate in a guided environmental walk which focussed on air quality, environmental noise, and biodiversity. The children were provided with monitoring equipment and paper materials to enable them to

investigate their local environment in its roadside setting and open space setting via a new stretch of active travel route. (see video below)

<https://youtu.be/Hlx0YCKUbCc>.

Manufacturers of monitoring instruments and council EVs were also showcased at the event start coupled with the Council Leader endorsing the event and a valuable contribution also being made by Welsh Governments Clean Air Champion Professor Paul Lewis. Clean Air Day is part of a wider range of work that Steve delivers throughout the year which includes annual reporting on air quality monitoring and action planning.

C. Waste

The council is continuing its work to meet Welsh Government zero waste targets by 2050. In 2021-22 the council once again surpassed its target for municipal waste reused, recycled and composted achieving 65.17%.

A proposal to move to 3 weekly collections during 23/24 was approved in February. This is expected to increase recycling by limiting residual waste capacity and we are targeting a rate of 70% for this year.

In addition, 7 out of our fleet of 16 refuse vehicles are now fully electric.

D. Shared Prosperity Fund

Funding has been approved for two carbon reduction projects through the Shared Prosperity Fund (SPF). One of these will provide funding over two years to support the decarbonisation of buildings used by the community. In addition, we have also secured funding to provide Green Skills training, e.g. installation of Air Source Heat Pumps.

4.6.2. Next Steps

The main priorities for this theme over the next 12 months are:

- Further improvements to waste collection provision to increase recycling rate to 70%
- Implement The Environmental Protection (Single-use Plastic Products) (Wales) Bill to remove single use plastics from our estate and work to remove single use plastics from our supply chain

5. ANNUAL CARBON REPORTING

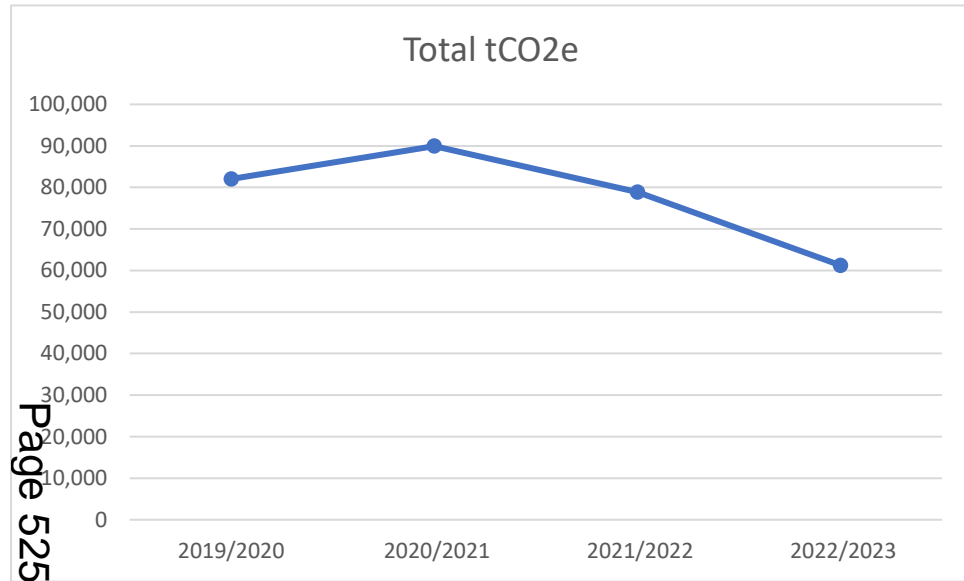
Welsh Government published [guidance](#) (May 2021) to public sector organisations to enable a consistent approach across Wales for reporting on their organisational carbon emissions. The reporting methodology considers all emissions associated with activities performed by local authorities including fuel, energy, water consumption, waste disposal, employee commuting, business travel and land use.

Figures for 22/23 have been included in the summary table below, with further analysis being provided for each of the delivery themes in the sections below.

	2019/2020	2020/2021	2021/2022	2022/2023
Overarching				
Total tCO ₂ e	82,005	89,943	78,901	61,246
Our Buildings				
Total building tCO ₂ e	15,231	11,404	12,787	11,525
Total fuel tCO ₂ e	8,575	7,455	7,901	7,120
Total electricity tCO ₂	6,619	3,911	4,832	4,368
Total heat & steam tCO ₂ e	37	37	55	38
Total water tCO ₂ e	136	101	44	21
Our Land				
Total tCO ₂ e from land assets	-1,041	-1,041	-829	-950
Transport & Mobility				
Total transport & mobility tCO ₂ e	5,603	2,280	4,844	4,808
Total fleet tCO ₂	2,184	2,066	2,298	1,979
Total business travel tCO ₂	299	58	143	212
Total employee commuting tCO ₂ e	3,120	156	2,403	2,617
The Goods & Services we Procure				
Total tCO ₂ e	55,168	56,190	40,231	25,550
Our Wider Role				
Total waste tCO ₂ e	6,908	21,009	20,279	18,576
Homeworking	n/a	n/a	1,545	1,715

5.1 Organisational Culture and Leadership

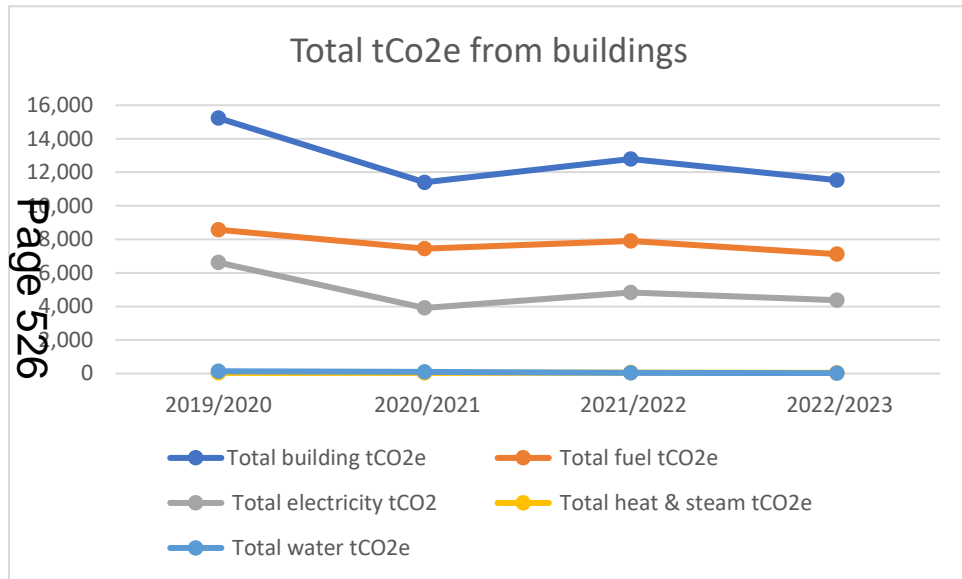
	2019/2020	2020/2021	2021/2022	2022/2023
Total tCO2e	82,005	89,943	78,901	61,246



In this area, there is a reduction of 17,655 tons annual from 21/22 to 22/23. Whilst carbon savings have been made through the variety of ongoing work and initiatives, the majority of this change is attributable to changes in our procurement figures, resulting from changes in the way that Welsh Government attributes supplier emissions. Using the previous reporting methodology, the emissions for 2022 / 23 calculate out to 78,036 tons.

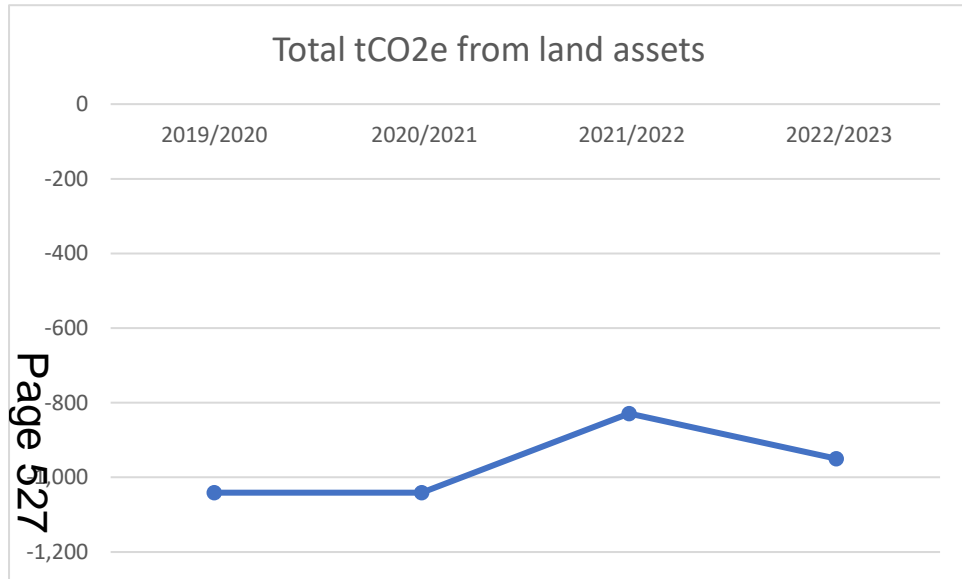
5.2 Our Buildings

	2019/2020	2020/2021	2021/2022	2022/2023
Total building tCO2e	15,231	11,404	12,787	11,525
Total fuel tCO2e	8,575	7,455	7,901	7,120
Total electricity tCO2	6,619	3,911	4,832	4,368
Total heat & steam tCO2e	37	37	55	38
Total water tCO2e	136	101	44	21



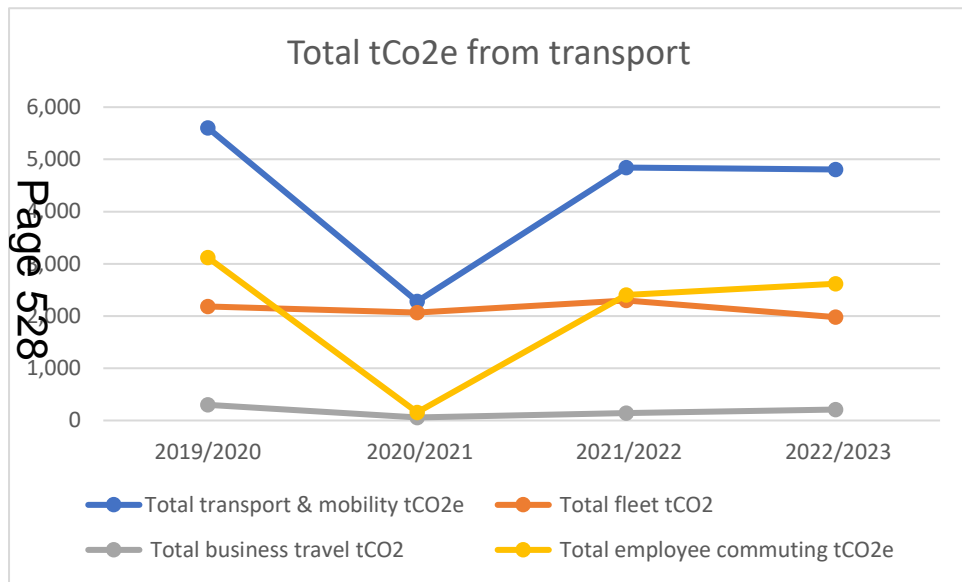
5.3 Our Land

	2019/2020	2020/2021	2021/2022	2022/2023
Total tCO2e from land assets	-1,041	-1,041	-829	-950



5.4 Transport and Mobility

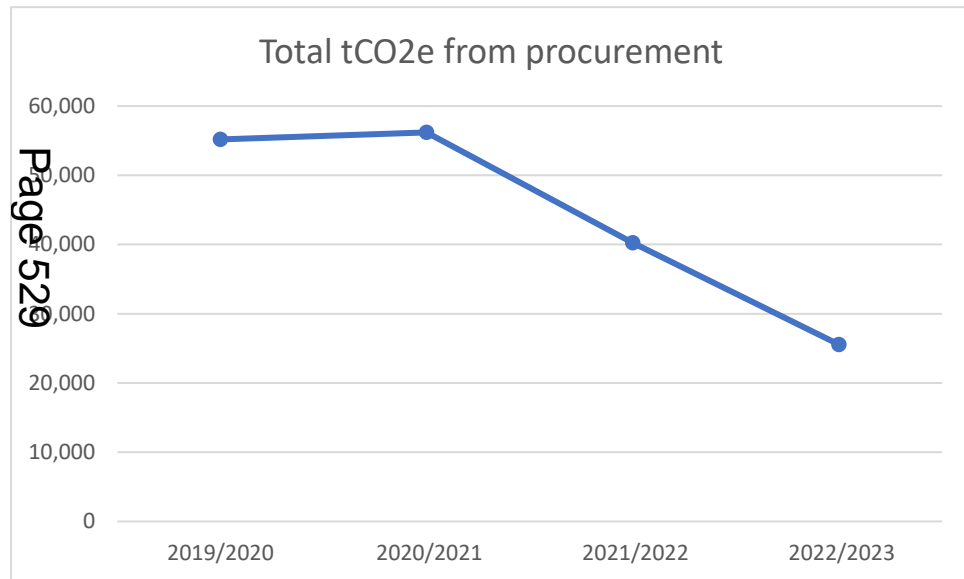
	2019/2020	2020/2021	2021/2022	2022/2023
Total transport & mobility tCO ₂ e	5,603	2,280	4,844	4,808
Total fleet tCO ₂	2,184	2,066	2,298	1,979
Total business travel tCO ₂	299	58	143	212
Total employee commuting tCO ₂ e	3,120	156	2,403	2,617



5.5 The Goods and Services we Procure

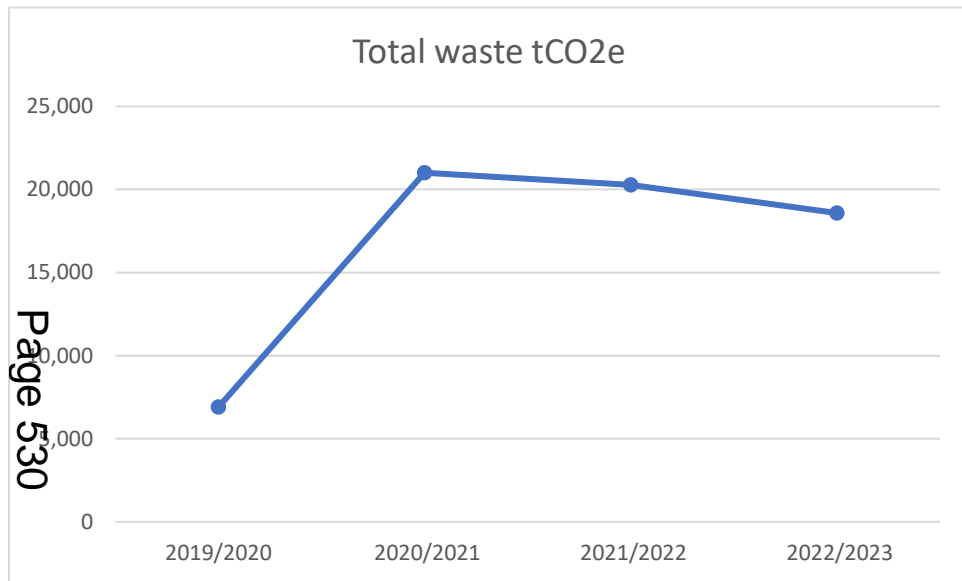
The large reduction seen in this year's figures is due to changes in the way that Welsh Government calculate supply chain emissions (Emissions Factors). This is primarily due to WG having made changes to their carbon factors based on Department for Energy Security and Net Zero research which shows a large reduction in the amount of CO2 due to the increase in renewables in our electricity supply. This research is carried out on an annual basis, but WG had not updated their carbon factors for a number of years, hence the dramatic change from 21/22 to 22/23.

	2019/2020	2020/2021	2021/2022	2022/2023
Total tCO2e from procurement	55,168	56,190	40,231	25,550



5.6 Our Wider Role

	2019/2020	2020/2021	2021/2022	2022/2023
Total waste tCO2e	6,908	21,009	20,279	18,576



6 APPENDIX A – 2022/23 ACTION PLANS

6.1 Organisational Leadership and Culture

Priorities	To achieve this, we will....	Actions required in 2022-23	RAG
1. Behaviours & Role-Modelling: <i>Our elected members and workforce will be encouraged and supported to consider their individual contribution to becoming net zero carbon by 2030, and leaders will role model the Council's expectations.</i>	i. Develop a programme of training for elected members, managers and staff.	<ul style="list-style-type: none"> Review and agree on preferred option for carbon literacy training. Procure carbon literacy training Investigate eco literacy and pilot. 	G
	ii. All elected members undertake eco and carbon literacy training within the first year after local elections with regular updates.	<ul style="list-style-type: none"> Source funding for training Arrange sessions for remaining members (1 session Oct/Nov - 1 session Feb) 	G
	iii. All senior managers (service manager and above) undertake mandatory eco and carbon literacy training.	<ul style="list-style-type: none"> Investigate number of managers to attend Source funding for carbon literacy training Arrange training 	G
	iv. Incorporate climate change vision and plan into the induction for every new member of staff in the Council.	<ul style="list-style-type: none"> Write content for recruitment page. Review and amend onboarding materials to include content where appropriate. 	G
	v. Provide mandatory climate and biodiversity awareness training for new / existing members of staff.	See 1i-iii	A
	vi. Provide staff with information and guidance on how they can support reducing their carbon footprint for their work/life choices.	<ul style="list-style-type: none"> Identify existing materials for signposting to include a carbon footprint calculator. Identify media to be used e.g. <ul style="list-style-type: none"> staff newsletter animation Intranet Desk top background Reaching all staff 	A
	vii. Lead by example and demonstrate the commitment to challenge poor practice and behaviours where the ecological and	<ul style="list-style-type: none"> Provide CMs and senior leaders with information to support the decision-making process Provide support and information for business cases and report writers 	G

Priorities	To achieve this, we will....	Actions required in 2022-23	RAG
	climate emergency is not being properly considered in the actions of others.	<ul style="list-style-type: none"> Implementation of TOMs Links with 2i 	
	viii. Embed net zero carbon, climate change and biodiversity action in our corporate values framework incorporating it into our people management activity such as recognition awards, performance management and behavioural frameworks.	<ul style="list-style-type: none"> Ensure this is considered when developing the People & Culture Strategy 	R
	ix. Support and encourage the workforce to embed carbon reduction, climate change and biodiversity action across the Council by setting up a Climate Change Network.	<ul style="list-style-type: none"> Promote Climate Change Network to recruit members All HoS to promote Climate Change Network to engage with staff that may not be part of this Set up Climate Change Network Staff member from network to attend the Culture & Leadership subgroup. 	G
Governance & Performance: <i>Our democratic and corporate functions will be committed to becoming net zero carbon by 2030, and our decision-making, governance framework and performance monitoring will reflect this commitment.</i>	i. All political and corporate decisions to evaluate the climate change, ecological and carbon reduction impacts as part of the decision-making process.	<ul style="list-style-type: none"> Review democratic report templates and amend to incorporate climate change and decarbonisation. Develop training to support this process. 	A
	ii. Ensure the work to develop the next Corporate Plan 2022-27 considers the commitments made in this plan and embeds our aspiration to be net zero carbon and reduce the impacts of the climate and nature emergency through the projects and objectives.	<ul style="list-style-type: none"> Ensure Climate Change and decarbonisation is considered as the new Corporate Plan is developed. 	G
	iii. Ensure performance measures include our organisational targets towards becoming net zero carbon and reducing the impacts of the climate and nature emergency.	<ul style="list-style-type: none"> Ensure carbon reporting is undertaken and reported to the Welsh Government on an annual basis. Add to service planning process Develop Climate Change reporting on MI Hub integrating with the service planning process. 	G

Priorities	To achieve this, we will....	Actions required in 2022-23	RAG
	iv. Review all policies and procedures to ensure that decarbonisation and climate and nature emergency are considered.	<ul style="list-style-type: none"> Contact service areas to investigate existing policies and procedures. Put a process in place to ensure all new policies consider climate change. See 4iii 	G
3. Promotion & Engagement: <i>Regularly publicise progress and achievements to embed aspirations to be net zero carbon by 2030</i>	i. Report on progress against the Climate Change Plan annually (See 1 above) as part of the Corporate Annual Report / Self-Assessment.	<ul style="list-style-type: none"> Add Annual Report to Cabinet and Council work programme Develop report 	G
	ii. Positively engage with our residents and communities on our journey to carbon zero. e.g. Newport Matters, messages from Leader/Cabinet Member/Chief Executive, social media, dedicated web page, interest groups etc	<ul style="list-style-type: none"> Use brand and animation once finalised. Use quarterly reporting to prompt promotion. Involve comms in projects as they are developed. Link to participation strategy 	G
	iii. Recognise positive actions and behaviours demonstrated by the workforce and publicise these through our engagement channels. e.g. staff newsletter, dedicated Intranet page etc.	<ul style="list-style-type: none"> Regular section in staff news Consider team/staff award process. 	A
4. Financial Commitment: <i>To plan for the financial impacts of climate change, and to ensure that our medium to long term financial planning contributes to the delivery of the Council's commitment to</i>	i. Consider the climate and nature emergency and carbon reduction initiatives within the Council's long term capital programme and revenue budget / Medium Term Financial Plan, maximising the use of external funding where possible.	<ul style="list-style-type: none"> Corporate plan to drive budget allocation Ensure incorporated in to the MTFP & capital programme Refer to Climate Programme Board to consider and take forward Review Capital and Treasury Management Strategy to ensure they consider climate change and the nature emergency. 	A
	ii. Commit to explore appropriate sources of external funding and innovative use of internal funds to drive the change required to achieve our aspiration to become net zero carbon by 2030.	<ul style="list-style-type: none"> Develop a funding needs plan to identify gaps Ensure all sources of funding are investigated and sort. 	G
	iii. All business cases for transformational change programme and projects consider	<ul style="list-style-type: none"> Update processes as part of the restructure and governance structure review. 	A

Priorities	To achieve this, we will....	Actions required in 2022-23	RAG
<i>reduce carbon emissions where possible.</i>	carbon reduction financial and non-financial impacts.	<ul style="list-style-type: none"> Review capital bid form to incorporate carbon reduction See 2iv 	
	iv. Review all investments to ensure they are invested in ethically based funds.	<ul style="list-style-type: none"> Review our existing investments Reflect ethically based investments in our Capital and Treasury Management Strategy 	G
	v. Use our influence to encourage the staff pension fund to invest in ethically based funds.	<ul style="list-style-type: none"> Ensuring that the pension board are aware 	A

6.2 Our Buildings

Priorities	To achieve this, we will....	Actions required in 2022-23	RAG
New Council Buildings: <i>All new buildings will be net zero carbon.</i>	i. Ensure commitment for building to be net zero carbon is clearly communicated to all stakeholders at the start of any new build project.	<ul style="list-style-type: none"> Discuss with Newport Norse. Develop a written policy to be agreed by Cabinet (Lead CMs are Infrastructure & Assets and Climate Change & Biodiversity and also CM Education & Early Years) 	A
	ii. Include requirements for buildings to use net zero carbon energy in the project brief.		
	iii. Include requirements for nature-based solutions and greening for all new buildings. For example, green roofs, green walls, SuDS etc		
	iv. Ensure early engagement to help develop the overall net zero carbon heating strategy for new buildings.		
	v. The Council to provide additional funding where reasonable to meet net zero carbon operational energy targets for new buildings.	<ul style="list-style-type: none"> Discuss with the Capital Team and Newport Norse. Agree on a reasonable financial percentage to meet net zero carbon targets for new buildings. 	A
2. Building Retrofitting:	i. The Council will set appropriate business case parameters to allow the deep retrofit	<ul style="list-style-type: none"> Discuss with Newport Norse. Engage an external provider to establish retrofit costs for all assets. 	G

Priorities	To achieve this, we will....	Actions required in 2022-23	RAG
<i>Deep retrofit to ensure creating net zero carbon energy buildings.</i>	of suitable sites and to tackle a blend of challenging and more straight forward measures from the outset.	<ul style="list-style-type: none"> Establish retrofit costs for all assets. 	
	ii. Solar PV generation will be maximised to provide the highest proportion of consumed electricity as is viable per location.	<ul style="list-style-type: none"> Apply the principle to every building being retrofitted Collect decarbonisation proposals for sites and review solar opportunities 	A
3. Renewable Heat: <i>Implementation of renewable heat in new buildings</i>	i. Mandate within the project brief that only low carbon heating solutions are to be considered as heating sources.	Included in 1.i-iv above	G
	ii. Ensure project team / building users have received necessary training on low carbon heating solution options.	<ul style="list-style-type: none"> Access & develop a training package for low carbon heating options being used on site Deliver training 	A
	iii. Consider nearby buildings (Council owned / public / private) when determining energy strategy for the building heat networks.	<ul style="list-style-type: none"> Map existing buildings to develop a map /opportunities list for heat networks. Consider other public sector buildings 	A
4. Natural Gas: <i>A commitment to significantly reduce or remove natural gas heating supplies across our buildings.</i>	i. Demonstrate commitment to wider roll out, by trialling 1-2 demonstration projects in the first year of the strategy.	<ul style="list-style-type: none"> Trial low carbon heating projects Complete works on low carbon schools 	G
	ii. Develop communication strategy for explaining decision to move to low carbon heating, and how that will affect building occupants.	<ul style="list-style-type: none"> Find / develop a video / content on low carbon heating to share with schools and sites 	A
	iii. Subsidise short term increased revenue costs for sites that have transitioned from gas heating to low carbon alternatives.	<ul style="list-style-type: none"> Discuss next steps with Finance Agree on process moving forwards 	A
5. Building Rationalisation: <i>Audit current assets to</i>	i. Develop a prioritisation matrix for rationalising current assets owned by the Council to include: <ul style="list-style-type: none"> - Current utility costs - Costs for deep carbonisation 	<ul style="list-style-type: none"> Complete prioritisation matrix Once received, incorporate decarbonisation costings into prioritisation matrix Incorporate into policy developed for 1i-iv & 3i 	A

Priorities	To achieve this, we will....	Actions required in 2022-23	RAG
<i>understand their long-term carbon impact with the aim of better strategic utilisation.</i>	ii. Identify properties which have significant long term carbon impacts on the Council if retained.	<ul style="list-style-type: none"> Acquisitions also needs to be considered here. 	
	iii. Identify properties that will require the largest investment to decarbonise.		
	iv. Carry out strategic review of assets.	<ul style="list-style-type: none"> Review assets and determine the appropriate guidance and sign off on decisions required for the current estate 	G

6.3 Our Land

Priorities	To achieve this, we will....	Actions required in 2022-23	RAG
1 Ecosystem Resilience: <i>Sustainably store, create and connect biodiversity and habitats by improving Council owned land and public realm</i>	i. Use green infrastructure mapping and assessment to change land management practices to create, maintain and restore biodiverse, climate resilient environments and provide carbon storage.	<ul style="list-style-type: none"> Create a usable mapping data base that teams can begin to populate with management plans and actions. Produce individual management plans for NCC sites Forward Chris Blandford Associates plan to develop to next level 	G
	ii. Review and adapt green infrastructure strategies to consider biodiversity, carbon reduction and natural flood management. (to link with urban forest strategy).	<ul style="list-style-type: none"> Review SPG documents i.e. Biodiversity and development SPG 	G
	iii. Update the enhanced biodiversity and resilience of ecosystems plan on a regular basis in line with the Environment Act duty.	<ul style="list-style-type: none"> Produce a forward plan and report on the last 3 years. 	G
	iv. Review the management of all Council owned land and public realm for improved quality of biodiversity and habitat creation (e.g. meadow and grassland improvement and creation etc).	<ul style="list-style-type: none"> Set up a task and finish group to undertake this work Review current tenancy agreements Engage with tenants Reappropriation of land as per new service areas –layers to be added to GIS mapping Norse to list suitable land 	A

Priorities	To achieve this, we will....	Actions required in 2022-23	RAG
		<ul style="list-style-type: none"> Available land to go to CSAMG 	
	v. Manage blue infrastructure effectively to reduce the risk of flooding, provide cooling, improve air quality and provide carbon storage.	<ul style="list-style-type: none"> SUDs strategy 	A
2. Trees & Woodland: Improve human health, environmental quality, carbon reduction and capture by sustainably managing and increasing Newport's trees and woodland.	i. Ensure an overall increase of tree cover by developing an urban tree strategy and reviewing and adapting existing tree planting policies to incorporate best practice.	<ul style="list-style-type: none"> Review of existing TPO and <i>NCC owned trees</i> policy. Reissue with amendments Review tree strategy best practice examples and create specific Urban Tree Strategy for Newport Team to continue with ongoing work and report back quarterly 	G
	ii. Improve baseline data of tree cover across the local authority area.	<ul style="list-style-type: none"> Liaise with i-tree Review and analyse the i-tree base line provided Explore other potential assessment tools to verify the current level of tree cover in the Authority. 	G
	iii. Identify suitable locations within Council land for tree planting including reallocation of land and replanting for losses in ash woodland.	<ul style="list-style-type: none"> Continue looking at the replacement of trees where Ash removal is occurring (compensation) Identify additional sites for tree planting and enhancement through mapping work Develop a palette of suitable tree species for the City Look to agree a policy regarding the sale of land that takes tree planting opportunities into account 	G
	iv. Increase tree cover In line with the findings of the iTree study by 26,000 on Council owned land.	<ul style="list-style-type: none"> Planting to take place in the appropriate season Continue monitoring planting vs removal figures 	G
	v. Ensure the sustainability of tree stock by maximising opportunities to source stock of local provenance and origin.	<ul style="list-style-type: none"> Identify local producers undertake financial vetting, provenance, and quality checks create select list in line with procurement 	G
	vi. Work with city partners to provide suitable locations within the Council land portfolio for tree planting including reallocation of	<ul style="list-style-type: none"> NCC Policy regarding the sale of land to be amended to include climate change potential Introduce a process by which reappropriation or sale of NCC land passes by this subgroup prior to CSAMG 	G

Priorities	To achieve this, we will....	Actions required in 2022-23	RAG
	land and replanting for losses in ash woodland.	<ul style="list-style-type: none"> NCC and Norse to discuss site disposal to determine whether there are any additional tree planting opportunities available 	
	vii. Evaluate the need and consider taking on low value land to increase tree cover and biodiversity.	<ul style="list-style-type: none"> Review the acquisitions policy to support the plan and themed actions identify NCC land unsuitable for future development review S106 policy to include land suitable to support climate change activity Identify any project development with external grant funding that could support the aims of this work Explore planning applications and “offers” of open space through S106 agreement to identify land that could benefit this subgroup 	A
<p>3. Urban Greenspace:</p> <p><i>Increase green infrastructure in the urban/public realm to reduce environmental inequalities, for the multiple benefits of nature’s recovery, human health and wellbeing, climate adaptation, cooling and flood alleviation, providing carbon reduction and clean air.</i></p>	<p>i. Create urban green spaces by reappropriating space and retrofitting innovations which could include:</p> <ul style="list-style-type: none"> pocket parks. Sustainable Drainage Systems (SuDS) / rain gardens. roof top spaces. green walls. water features for cooling effects. more porous pavements. wildflower planting. street trees and hedges in areas of high air pollution. invest in trees to keep urban areas cool and provide shade to protect from heat, and flooding. 	<ul style="list-style-type: none"> Revisit and review feasibility study for the city centre Expand this to cover the whole city Input this study into existing masterplans to ensure actions from this subgroup are incorporated and any “overlap” of land use is identified From the feasibility study, identify areas where schemes can be implemented quickly Identify what external support is needed Identify funding sources and procurement processes to assist in the overall schemes and projects from the masterplan Engage with Housing Associations regarding land management 	G
	i. Review Council owned land and identify opportunities to work with tenants to	<ul style="list-style-type: none"> Identify potential tenants and groups Identify lease holders 	A

Priorities	To achieve this, we will....	Actions required in 2022-23	RAG
4. Council Owned Leased Land: <i>Support the nature recovery whilst reducing carbon emissions from Council owned farmland and any other leased land.</i>	reduce carbon emissions and improve biodiversity and carbon capture.	<ul style="list-style-type: none"> Review associated landowners and managers i.e., housing association, Review terms and conditions of lease and licences Engage with Tredegar House regarding land management 	A
	ii. Make aware and encourage tenants to take up initiatives to reduce carbon emissions and improve biodiversity and carbon capture.	<ul style="list-style-type: none"> RC and CRT to identify measures that could be incorporated into new leases and/or licences Discuss the potential of these measures with existing tenants 	

6.4 Transport and Mobility

Priorities	To achieve this, we will....	Actions required in 2022-23	RAG
Page 539 Business (Grey) Mileage & Staff Commuting: Reduce carbon emissions from employee commuting and grey mileage by implementing a policy of agile working, active travel and usage of public transport and ultra-low	i. Reduce commuting by single use car by implementing a new operating model including hybrid home working and use of local public sector hubs: <ul style="list-style-type: none"> Identified employees to work average of 40% work 60% home. 	<ul style="list-style-type: none"> Sign off home working policies Sign of funding by cabinet and exec board Develop proposals for parking at the civic centre Presentation to exec board on car parking 	G
	ii. Increase participation in active travel including cycling, walking and use of public transport: <ul style="list-style-type: none"> Increase promotion of cycle to work scheme and extend to e-cycling bikes. 	<ul style="list-style-type: none"> Continue to publicise 	G
	<ul style="list-style-type: none"> Review potential to offer cycle to work scheme throughout year. 	<ul style="list-style-type: none"> Agree with benefit provider 	G
	<ul style="list-style-type: none"> Extend our discount schemes to all bus and train providers. 	<ul style="list-style-type: none"> Negotiate with bus providers re possible discount schemes 	A

Priorities	To achieve this, we will....	Actions required in 2022-23	RAG
emissions vehicles (ULEVs).	<ul style="list-style-type: none"> Promote employee benefits scheme for active travel i.e., outdoor leisure shops that sell cycling/walking kit. 	<ul style="list-style-type: none"> Agree with benefit provider 	G
	<ul style="list-style-type: none"> Install/ provide storage, showers / changing, lockers at main sites. 	<p><i>Funding under the new normal</i></p> <p><i>Burns money could be available here</i></p> <p><i>Secure storage -cycle hangers</i></p> <p><i>Also need to think about depot</i></p> <ul style="list-style-type: none"> ATNM should provide information on locations of suitable routes and storage sites. 	A
	<ul style="list-style-type: none"> Promote cycle hire/safe routes to work. 	<ul style="list-style-type: none"> Develop the travel page on intranet Promote through articles in bulletin. 	G
	<ul style="list-style-type: none"> Consider introducing car sharing and park and ride if beneficial. 		A
	iii. Review and update Travel & Subsistence Policy to promote carbon reduction initiatives: <ul style="list-style-type: none"> Hire cars should always be ULEV. 	<ul style="list-style-type: none"> Already reviewed Agreement by the Employment Partnership Forum App to be designed to book fleet 	A
	<ul style="list-style-type: none"> Reduce car mileage allowance for petrol/diesel vehicles incrementally over 5-year period (but retain current mileage rates for ULEV). 	<ul style="list-style-type: none"> No action currently – long term action 	G
	<ul style="list-style-type: none"> Allow home to work claims to prevent unnecessary journeys to a workplace to start work (especially if ULEV). 	<ul style="list-style-type: none"> Include in the new Travel & Subsistence Policy. See 1i 	G
	<ul style="list-style-type: none"> ULEV fleet vehicles to be used for business travel when required. 	<ul style="list-style-type: none"> Develop App for booking Purchase vehicles 	A
	<ul style="list-style-type: none"> Consider incentives for active travel including on street bike hire fees when in place. 		A

Priorities	To achieve this, we will....	Actions required in 2022-23	RAG
	iv. Develop and implement sustainable travel plans for key Council sites.	<ul style="list-style-type: none"> Identify key sites that require travel plan and create a template sustainable travel plan. 	G
	v. Ensure sustainable transport options are available from the outset of a Council new builds.		G
2. <i>Fleet:</i> Reduce Council carbon emissions by moving to a ULEV fleet.	i. Develop a 5-year plan for fleet renewal and charging capacity.	<ul style="list-style-type: none"> Develop a financial plan for replacement of vehicles which will form part of the budget setting going forward 	A
	ii. Replace vehicles and plant with ULEV as they come up for renewal.	<ul style="list-style-type: none"> All vehicle and plant procurement includes consideration for an electric alternative 	G
	iii. Investigate the feasibility of the conversion of existing vehicles		G
	iv. Provide manual and electric bikes for staff to undertake site visits and inspections as part of Council fleet.	<ul style="list-style-type: none"> Could link to on street bike hire 	A
	v. Increase charging capability at Council sites as the fleet increases.	<ul style="list-style-type: none"> To develop a costed plan for roll out of EV infrastructure for the Civic, schools & social services sites Survey remainder of Social Services sites Commission surveys for schools 	G
	vi. Investigate the feasibility of energy banks on site to store electricity for contingency.	<ul style="list-style-type: none"> Review the business case for battery storage taking into account energy price increases 	G
	vii. Link charging capability to solar source and other small-scale renewables.	<ul style="list-style-type: none"> Share the business case with CSAMG for increase of solar PV at Telford depot Review the feasibility of solar car ports across our estate 	A
	viii. Develop a vehicle disposal policy.	<ul style="list-style-type: none"> Policy in place just to be reviewed to be fit for purpose 	G
3. <i>Transport network:</i> Managing the transport network to enable people to travel in a	i. Prioritise walking, cycling and public transport in line with the sustainable travel hierarchy by: <ul style="list-style-type: none"> Tackling illegal parking (already in place). 		G
	<ul style="list-style-type: none"> Apply for moving traffic offence powers. 	<ul style="list-style-type: none"> Decision taken to apply for the powers. Council report seeking approval for an application to be made to WG 	A

Priorities	To achieve this, we will....	Actions required in 2022-23	RAG
more sustainable way.		<ul style="list-style-type: none"> Commencement of application process with Welsh Government 	
	<ul style="list-style-type: none"> Tackle pavement parking in line with WG legislation. 	<ul style="list-style-type: none"> No action required at this stage 	G
	<ul style="list-style-type: none"> Adopting new hierarchy of road users as contained in the highway code. 	<ul style="list-style-type: none"> Adoption of the “Sustainable Transport Hierarchy” as set out in Llwrbr Newydd. The hierarchy will apply to all transport related infrastructure projects, activities, policies and plans by the council All future policies and plans to be prepared in line with these principles where applicable Existing policies and plans will be reviewed in line with the new principles 	G
	<ul style="list-style-type: none"> Implement 20 mile an hour limit. 	<ul style="list-style-type: none"> Reviewing of exceptions Confirm exceptions with TfW Collection and review of sign /line asset data Planning for resigning of network Early removal of unnecessary or redundant signage Commence TRO processes for revocations and exceptions 	G
Land Use Planning & Placemaking: Ensure sustainable transport options are available from the outset in all new developments, including walking, cycling, public transport and electric	i. Ensure all new developments maximise sustainable travel opportunities.	<ul style="list-style-type: none"> Undertake a dip sample of planning applications to ensure that sustainable travel is being proposed. Ensure Movement and Transport is a main topic area of the LDP. Review AQ SPB / ST SPG in line with review timescales. 	G
	ii. Review the Local Development Plan and other planning guidance to strengthen sustainable travel policies.		G

Priorities	To achieve this, we will....	Actions required in 2022-23	RAG
charging infrastructure.			
5. Active Travel: Reduce carbon emission by prioritising active travel across the city.	i. Improve and expand the current active travel network across the city to connect communities.	<ul style="list-style-type: none"> Complete annual programme of improvement measures funded through Active Travel Core allocation and standalone WG and other grants. Identify other potential sources of funding to implement schemes i.e. S106 and SPF grants. Extend the network following approved statutory and non-statutory plans 	G
	ii. Engage with communities to develop the next Active Travel Network Map to inform the improvements and expansion priorities.	<ul style="list-style-type: none"> Priority programme of schemes to be developed to enable team to focus bidding for the next 5 years Develop visuals for specific schemes to enable community engagement. Work with schools and highways to incorporate 'Safe Routes' on ATNM 	G
	iii. Use the Active Travel Network map to develop a new accessible public cycle map.	<ul style="list-style-type: none"> Production and Publication of map available through web site and in hardcopy format 	A
	iv. Promote active travel routes and choices across the city.	<ul style="list-style-type: none"> Complete package of promotion work that stated in 2021. This includes: <ul style="list-style-type: none"> videos of AT routes available, interviews with users to encourage behaviour change, info on journey times between destinations, mapping available for all including school specific and remote access Link with behaviour change group to promote through events in City 	G
	v. Implement a city-wide bike hire scheme (to include e-bikes).	<ul style="list-style-type: none"> Sign off business case and source funding for in year for whole scheme. 	A
	vi. Remove barriers to active travel by way of secure cycle parking / cycle hubs, drop curbs, improving Illegal parking and improving safety.	<ul style="list-style-type: none"> Complete 'Gap' Project – cycle storage in city centre Begin roll out of on and off-street cycle hangers including Cycle hangers in multi-story car parks 	G
6. Public Transport: Encourage the use of public transport	i. Improve travel information at bus stops to encourage the use of public transport.	<ul style="list-style-type: none"> Review current timetable infrastructure and information at stops and the bus station, including Real Time provision 	A
	ii. Implement the Flexi-pilot scheme (Demand responsive service).	<ul style="list-style-type: none"> Maintain 3 current Newport City Council DRT schemes, Continue to work with TfW on their pilot scheme (TfW contract and fund Fflecsi) 	G

Priorities	To achieve this, we will....	Actions required in 2022-23	RAG
instead of car usage.	iii. Set up a regional bus network (Reference Network).	<ul style="list-style-type: none"> Work with funders to maintain core bus network 	G
	iv. Continue to support the socially necessary bus network.	<ul style="list-style-type: none"> Work with funders to maintain supported for the socially necessary bus network 	G
	v. Continue to promote the use of public transport to reduce emissions.	<ul style="list-style-type: none"> Work with stakeholders to promote public transport use Develop initiatives within Newport to promote the use of public transport Continue to provide improved infrastructure to act as a Shop Window 	G
	vi. Provide sustainably powered bus infrastructure (bus shelters solar powered) where possible.	<ul style="list-style-type: none"> Ensure all new shelters are provided with solar power to minimise environmental impact and cost of mains connection 	G
	vii. Work in partnership on promoting and reducing the barriers to using public transport such as safety, cost and accessibility	<ul style="list-style-type: none"> Work with key partners to reduce barriers 	G
Charging Point Infrastructure: Increase charging capacity across the city.	i. Increase public charging units across the city considering strategic sites to fit with the wider network.	<ul style="list-style-type: none"> Map out existing public charger locations in Newport Identify locations for additional rapid charging hubs Identify funding opportunities Explore NCC sites with existing PV to help reduce demand on the grid Track charger numbers in relation to LAEP targets 	G
	ii. Develop an on-street charging installation policy for Newport.	<ul style="list-style-type: none"> Review existing policies adopted by other LAs Develop a Newport specific policy 	G
	iii. Increase the number of residents without off street parking that are in a 5-minute walk of a charging point.	<ul style="list-style-type: none"> Identify the highest density areas of properties without off-street parking Map out existing public charging points in Newport Look at local infrastructure in the area Investigate funding opportunities Develop a roll out plan 	G
	iv. Work in partnership with the region to develop a regional approach to EV charge point infrastructure.	<ul style="list-style-type: none"> Continue working with CCR to roll out EV charging infrastructure throughout Newport Explore the opportunity of keeping consistent networks throughout the area to make charging easier for residents 	G

Priorities	To achieve this, we will....	Actions required in 2022-23	RAG
8. Schools: Reduce carbon emissions from home to school travel.	i. Roll out active travel programmes schools as funding becomes available.	<ul style="list-style-type: none"> Undertake initial mapping exercise for of programmes in place currently Look at which schools could have improved safe routes to be included in the next Active Travel map 	G
	ii. Improve safe active travel links to schools.	<ul style="list-style-type: none"> Walking route assessments for schools Develop active travel maps for schools. 	G
	iii. Roll out anti-idling campaigns at schools as funding becomes available.	<ul style="list-style-type: none"> Closer engagement with schools through AQMA groups and as an AQAP measure will underpin uptake of anti-idling. 	G
	iv. Pilot traffic free streets near schools.	<ul style="list-style-type: none"> Work with Sustrans to engage with stakeholders Linked to moving traffic offences 	A
	v. Utilise the public transport network for home to school transport where possible.	<ul style="list-style-type: none"> Identify opportunities to utilise public transport network and issue season tickets to eligible pupils 	G
	vi. Analyse results of home to school taxi and bus contract study to agree date when ULEV will become mandatory.	<ul style="list-style-type: none"> Link to regional work already undertaken CENEX & CCR 	A
	vii. Ensure that sustainable transport options are available from the outset in all new schools, including walking, cycling, public transport and electric charging infrastructure.	<ul style="list-style-type: none"> Ensure all planning applications are reviewed by AQ officer 	G
9. Taxis: Implement policies to support the move to a low emission taxi fleet.	i. Develop a ULEV taxi pilot.	<ul style="list-style-type: none"> Develop a further data led EV taxi trial / loan scheme. 	R
	ii. Install charging points for taxis		R
	iii. Reduce emissions from taxi fleet by implementing minimum requirement of Euro 6 vehicles for licencing.		A
	iv. All new license taxis to be ULEV		A

6.5 The Goods and Services we Procure

Priorities	To achieve this, we will....	Actions required in 2022-23	RAG
1. Measurement: <i>Gain a good understanding of our estimated CO₂e per annum from procured goods and services, and its emissions profile and supplier base.</i>	i. Undertake initial baselining exercise to gain an estimation of the carbon emissions from procurement.	Compete annually	A
	ii. Develop a measurement tool to give more detailed information of the areas of focus (could be facilitated via the social value tool below).	<ul style="list-style-type: none"> Investigate other measurement tools Work with procurement and understand how the current social value tool works 	G
	iii. Work with suppliers to review and measure carbon footprint of existing contracts.	<ul style="list-style-type: none"> Develop questionnaire for use Pick approx. four key contracts and engage with the suppliers for completion of questionnaire 	A
	iv. Use this information gained in iii to inform future direction for new tender specifications, carbon questionnaires and TOMs requirements.	<ul style="list-style-type: none"> Develop new tender templates and documentation for use across the procurement Gateway Process. Carbon reporting will be required for contracts in line with WPPN 06/21. WPPN 12/21 will be used to help inform new specifications and questionnaires. Agree the value of contracts that will require carbon reporting. 	G
2. Guidance, tools and training: <i>Develop guidance, tools and training for the organisation to support staff to reduction of carbon throughout the procurement lifecycle.</i>	i. Develop and build on the Council's procurement gateway process to fully consider climate change, carbon reduction and sustainability.	<ul style="list-style-type: none"> Develop and start using new template forms. Add forms to intranet pages. 	G
	ii. Consider climate change and carbon reduction action at the early stage of the procurement planning process and contract development by: <ul style="list-style-type: none"> developing a new tender action timetable template and using annual forward work plans to help inform on upcoming tenders. 	<ul style="list-style-type: none"> Develop and start using new template forms. CR Team to assist and review CR measures in project proposals prior to Gateway sign off. Procurement Team to update and start to use updated Tender Action Timetable. 	G

Priorities	To achieve this, we will....	Actions required in 2022-23	RAG
	iii. Implement a social value tool (e.g. National TOMs) that considers climate change and carbon reduction to assist with evaluation.	<ul style="list-style-type: none"> • Agree tender value for carbon questionnaire and TOMs • Develop and start using National TOMs and carbon questionnaire for tenders above agreed value. 	G
	iv. Provide appropriate training to undertake the new processes for: <ul style="list-style-type: none"> • procurement staff • staff/managers undertaking the procurement process • gateway decision makers 	<ul style="list-style-type: none"> • Produce material to inform and train colleagues in new Gateway Processes 	A
	v. Use networking and collaboration to seek out best practice and idea sharing.	<ul style="list-style-type: none"> • Attendance at National Procurement Network (PT) • Carbon Reduction Team to share invitations to relevant groups, meetings, and webinars as they are advertised. 	G
3. Partnership: <i>Lead by example and work with our strategic partners both public and private to align nature recovery, climate change, carbon reduction and circular economy aspirations.</i>	i. Ensure Newport Norse are fully engaged in this carbon net zero agenda and conduct procurements accordingly.	<ul style="list-style-type: none"> • Discuss with Capital Board about non educational projects also featuring in this process. 	G
	ii. Consider if Newport Norse tendering requires the same carbon scrutiny in line with revised procurement gateway processes.		G
	iii. Engage with other key partners (including strategic suppliers) to seek out carbon reduction opportunities during the lifetime of contracts.	<ul style="list-style-type: none"> • Identify which contracts are to be prioritised first 	A
	iv. Ensure collaborative contracts include carbon reduction measures and that collaborative contract management includes the ability to capture lifetime data and seek continuous improvements.	<ul style="list-style-type: none"> • Work with lead contracting organisations prior to signing up to collaborative contracts, and ensure measures meet with NCC requirements before committing. • Procurement team make sure that any collaborative contracts address this – this work is ongoing with other LAs • Procurement will monitor arrangements and make sure that carbon reduction measures are in place 	G

Priorities	To achieve this, we will....	Actions required in 2022-23	RAG
4. Engagement: <i>Incentivise suppliers through proportionate evaluation criteria to proactively seek opportunities to support the nature recovery and reduce carbon and climate impacts.</i>	i. Use the Welsh National TOMs as scorable evaluation criteria in medium & high value tenders.	<ul style="list-style-type: none"> Amend guidance and tender documentation to include a new Climate/Carbon section detailing the drive to net zero and the expectations on our suppliers. Amend guidance and tender documentation to include scorable questions which will be evaluated and will feed into overall evaluation 	A
	ii. Brief potential suppliers on the carbon reduction need for each procurement.	See 4i <ul style="list-style-type: none"> Undertake supplier events or other communication methods to inform suppliers of CR requirements. 	A

6.6 Our Wider Role

Priorities	To achieve this, we will....	Actions required in 2022-23	RAG
Placemaking & Building Control: <i>Reduce carbon emissions and support nature recovery by focusing on sustainable, low carbon development, influencing low carbon energy and building resilient communities</i>	vi. Ensure all developments are fully aligned with Planning Policy Wales 11, the Well-being of Future Generations (Wales) Act 2015 and the Placemaking Wales Charter.	<ul style="list-style-type: none"> Review LDP annual monitoring report to highlight any issues with conformity (published Oct). 	G
	vii. Ensure sustainable transport options are available from the outset in all new developments, including walking, cycling, public transport and electric charging infrastructure by: <ul style="list-style-type: none"> Ensuring all new developments maximise sustainable travel opportunities. Reviewing the Local Development Plan and other planning guidance to strengthen sustainable travel policies. 	<ul style="list-style-type: none"> Undertake a dip sample of planning applications to ensure that sustainable travel is being proposed. Ensure Movement and Transport is a main topic area of the LDP. 	G

Priorities	To achieve this, we will....	Actions required in 2022-23	RAG
	viii. Encourage our partners to move towards carbon neutral new developments which consider the nature and climate emergency and incorporate nature-based solutions.	<ul style="list-style-type: none"> Ensure that the requirement for sustainable development is included in the vision and objectives of the Replacement LDP. All pre-app responses to include a link to nature-based solution information Undertake a dip sample of planning applications to ensure that nature-based solutions are being proposed by Ecology lead. 	G
	ix. Encourage developments to include local heat networks within major developments.	<ul style="list-style-type: none"> Monitor number of planning applications that include heat networks. 	G
	x. Identify a renewable energy target for Newport and ensure sufficient land is allocated to meet that target.	<ul style="list-style-type: none"> Target set out in LAEP Planning and Climate Change Team to work together to ensure this is contained in the new LDP. 	G
	xi. Ensure developers meet national flood risk requirements for new developments.	<ul style="list-style-type: none"> Monitor number of applications that do not meet all flood risk tests. 	G
Energy: <i>Identify and implement the changes needed to the local energy system to decarbonise heat, electricity and local transport and realises local renewable energy production.</i>	i. Develop a Local Area Energy Plan for the Newport area which will inform, shape and enable the transition to net zero carbon energy for a whole area aligned with regional energy strategies and governance arrangements.	<ul style="list-style-type: none"> Agree Local Area Energy Plan at June Cabinet 	G
	ii. Deliver first phase of the Local Area Energy Plan, which indicates priority energy interventions to meet our power, heat and transport needs for the city.	<ul style="list-style-type: none"> Recruit programme manager. Develop short-term and long-term plan for delivery. Develop a plan for funding arrangements to support and enable the delivery of the LAEP. Work with other LAs to develop energy opportunities at scale. 	G
	iii. Work to a single vision and plan with public and private sector partners to deliver on a range of projects across heat, power and transport to decarbonise the local area and region.	<ul style="list-style-type: none"> See point 2i Apply for shared prosperity funding 	G

Priorities	To achieve this, we will....	Actions required in 2022-23	RAG
	iv. Support the Welsh Governments renewable local ownership energy target energy-generation-in-wales-2019	<ul style="list-style-type: none"> Investigate opportunities for renewable energy development on NCC land Look at opportunities for private wires/networks Map out all public sector sites for opportunities to share energy 	G
	v. Raise awareness and enforce the minimum energy efficiency standards for rental properties. (An Energy performance certificate (EPC) rating of A to E is required on these properties to comply with the law).	<p><u>F&G EPC properties</u></p> <ul style="list-style-type: none"> Deliver enforcement outcomes related to enforcement notices. Ongoing monitoring of new illegal properties entering the market. <p><u>No EPC properties</u></p> <ul style="list-style-type: none"> Deliver enforcement outcomes related to those landlords operating without an EPC. Ongoing monitoring of new illegal properties entering the market. 	G
3. Flooding: Build climate resilience and alleviate flooding across the city using a range of measures including natural flood defences.	iv. Develop a sustainable drainage strategy for Newport and maximise opportunities for SuDS.	<ul style="list-style-type: none"> Hold regular workshops with the SAB to develop a draft SuDS design guide for NCC 	G
	v. Update flood risk management plan and strategy in line with national strategy.	<ul style="list-style-type: none"> Await publication of new WG template for the new local flood risk management strategies Flood Risk Officer to start working on existing WG draft template 	G
	vi. Apply for Welsh Government grant funding for schemes as it becomes available.	<ul style="list-style-type: none"> To compile bids for grant funding for submission to WG for 2023/24 Manage progress of the small-scale revenue funded drainage schemes approved for 2022/23. To compile bids for capital grant funding requirements for 2023/24 Manage progress of the existing capital schemes approved for 2022/23. 	G
	vii. Investigate any problems with existing assets and update the flood asset databases.	<ul style="list-style-type: none"> Ongoing investigation of flooding incidences including carrying out WG revenue grant funded CCTV surveys and desilting in known problem areas. Where further works are identified a list of potential schemes can then be compiled for future capital/revenue grant funding bids to WG. Ongoing update of Geoenvirom flood asset database, including revenue grant funded asset condition surveys. 	G
	viii. Work with partners Welsh Waters, NRW and other local authorities upstream	<ul style="list-style-type: none"> Consult with LAs within the South East Wales Flood Risk Management Group, other SABs, DCWW, NRW and WG regarding flood risk. 	G

Priorities	To achieve this, we will....	Actions required in 2022-23	RAG
	to influence decision making relating to flood defences.		
4. Waste: <i>Reduce carbon emissions from managing waste to become a zero-waste city and nation by 2050.</i>	i. Lead by example and embed waste minimisation and circular economy principles and practice across the Council departments.	<ul style="list-style-type: none"> Input into other themes of climate change plan where appropriate – especially procurement Replace recycling hubs in Civic with new bins purchased April 2020 for consistency. 	G
	ii. Continue to align with Welsh Government ambitions to reduce landfill waste and increase recycling	<ul style="list-style-type: none"> Recycling rate for 21/22 is 67% - to sustain and improve this into 22/23. Identify methods to target and achieve 70% recycling for 2024/25 Increase recycling in flats and also non-domestic recycling Continue to work with reuse organisations (Wastesavers, Repair Café, Remake Newport etc.) and support third sector, charity and voluntary projects to reduce waste. 	G
	iii. Work with the Welsh Government to ensure appropriate monitoring is in place to encourage reduction in all waste.	<ul style="list-style-type: none"> Continue to complete statutory reports 	G
	iv. Replace refuse fleet vehicles with ULEV as they come up for renewal.	<ul style="list-style-type: none"> Trailing vehicles as they become available. Work to resolve vehicle and charging issues. 	G
	v. Support our communities to become plastic free “Plastic free Newport”	<ul style="list-style-type: none"> Review progress against NCC Plastic Motion Link with procurement to eliminate single use plastics across contracts – especially in schools and council premises Follow up with plastic free schools – Jubilee Park, Glasllwch, Gwent Iscoed, Maindee, Caerleon primary and secondary, Ringland Make all public access NCC buildings water refill stations. Identify community interest groups / activities 	A
5. Digital: <i>Utilise digital solutions effectively to reduce and monitor carbon emissions.</i>	i. Develop a new digital strategy that fully considers the Council’s climate change commitments and net zero aspirations. <ul style="list-style-type: none"> Actively considers climate change and associated actions Supports the “new normal” way of working and associated actions. 	<ul style="list-style-type: none"> Digital Strategy to be completed NCC web site re-development commences 	A

Priorities	To achieve this, we will....	Actions required in 2022-23	RAG
	<ul style="list-style-type: none"> - Provide technology solutions that reduce the need for customer and staff travel. - Maximise the use of digital solutions to reduce paper usage including digitising paper records where possible - Minimise data storage to reduce infrastructure requirements and reduce energy consumption. 		
	ii. Migrate to more energy efficient technology solutions including data centre and cloud provision taking advantage of economies of scale in terms of cooling efficiency.	<ul style="list-style-type: none"> • Priority IT system cloud migrations • SRS migrating partners to Vantage Data centre in 22/23 	G
	iii. Maximise the use of digital solutions such as Internet of Things (IoT) network to measure climate change action and carbon emissions. For example, air quality, flood risk, carbon emissions	<ul style="list-style-type: none"> • Further testing of Internet of Things (IoT) network 	G
	iv. Providing information and data to facilitate organisational and individual informed decisions around climate change and carbon emissions.	<ul style="list-style-type: none"> • Continued development of the Newport Intelligence Hub (NIH) • Work across council to share relevant data 	G
	v. Work with IT Partner, Shared Resource Service (SRS) Wales to consider climate change measures across service delivery and take appropriate actions to reduce energy usage and reduce carbon and waste.	<ul style="list-style-type: none"> • Develop programme of relevant activities with SRS 	A
	vi. Consider climate impact and carbon reduction when purchasing IT equipment.	<ul style="list-style-type: none"> • Develop and review policies and associated actions 	A

Priorities	To achieve this, we will....	Actions required in 2022-23	RAG
	vii. Embed reduce, reuse, recycle principles in IT policies and practices.	<ul style="list-style-type: none"> Review policies and associated actions 	A
6. Partnerships & Communities: <i>Work collaboratively with partners and communities to promote the climate and nature recovery across the city.</i>	i. Work with our partners to ensure communities feel connected to nature and have easy access to safe, quality green and blue spaces for health, well-being, play and recreation and empower communities to take an active role in decision making and managing local green spaces.	<ul style="list-style-type: none"> Continue to deliver the aims and objectives of the Green and Safe intervention under the current Wellbeing Plan Continue to engage with Gwent Green Grid and other Gwent Local Authorities to identify projects where a regional approach would be beneficial Develop a Local Action Plan (Environment) which will identify opportunities to work with Partners under the new Wellbeing Plan (2023-28) Deliver Community Gardens project Explore options for development of Green Infrastructure in City Centre and wider urban areas 	A
	ii. Ensure communities and One Newport partnership partners are fully engaged in the development and implementation of the Newport wide climate strategy.	<ul style="list-style-type: none"> Work with partners to design and develop a community and business engagement action plan 	A
	iii. Ensure key stakeholders including local businesses are fully involved in the development of the Local Development Plan	<ul style="list-style-type: none"> No further action required – all already in place. 	G
	iv. Work with partners and communities across Newport and Monmouthshire to ensure nature recovery, remembering that our natural resources have a key role to play in climate change mitigation and adaptation and developing a Local Nature Recovery Action Plan (LNRAP)	<ul style="list-style-type: none"> Work with Gwent LA partners LNP engages with local communities to determine local priorities 	A
	v. Ensure all stakeholders including the industrial cluster and the residential sector are fully engaged in the	<ul style="list-style-type: none"> Become part of SWIC to ensure engagement with industry. Engage with WPD regarding the connection of new generation assets Engage with WWU regarding the hydrogen network required to support industry and the potential for hydrogen fuelled vehicles 	A

Priorities	To achieve this, we will....	Actions required in 2022-23	RAG
	development and implementation of the Local Area Energy Plan.	<ul style="list-style-type: none"> Collaborate and support the delivery of the SE Wales Regional Transport Plan. Collaborate across LAs across Wales to develop opportunities for investment in energy projects at scale. 	
	vi. Embed climate change mitigation and adaptation opportunities into the air quality action planning process with communities and stakeholders.	<ul style="list-style-type: none"> Section on Climate change: its strategic mitigation and air quality synergies in AQAP. Completion of draft AQAP for December scrutiny by cabinet member. Continue work with AQ groups across AQMAs and look at extending messages beyond AQMA communities. Extend Labour manifesto commitment to annual Clean Air Day events to include Climate Change relationships as part of these events where possible. 	G

7 APPENDIX B – 2023/24 ACTION PLANS

7.1 Organisational Leadership and Culture

Priority Area	Action	Date
1. Behaviours & Role-Modelling: <i>Our elected members and workforce will be encouraged and supported to consider their individual contribution to becoming net zero carbon by 2030, and leaders will role model the Council's expectations.</i>	i. All (Senior)HR Business partners to undergo Carbon Literacy training and HR to identify other teams that would benefit from training	Mar 24
	ii. Embed carbon literacy/climate change in L&D provision for senior managers and other staff, including provision of mandatory training/e-learning.	Mar 24
	iii. Continue roll-out of carbon and eco literacy training for elected members	Mar 24
	iv. Deliver All Member session on Climate Change (organisational and LAEP)	Dec 23
	v. Support and develop the work of the Climate Change Staff Network	Mar 24
	vi. Explore options for senior leadership to continue to role-model behaviour – e.g. follow up on commitments from Carbon Literacy training	Mar 24
2. Governance & Performance: <i>Our democratic and corporate functions will be committed to becoming net zero carbon by 2030, and our decision-making, governance framework and performance monitoring will reflect this commitment.</i>	i. Review democratic report templates and amend to incorporate climate change and decarbonisation.	Dec 23
	ii. Climate Change annual report – cross-pollination with other reports and comms.	Nov 23
	iii. Explore inclusion of climate change implications/adaptation within service plans	Mar 24
	iv. Develop reporting and performance management relating to Climate Change Plan (MiHub)	Mar 24
3. Promotion & Engagement:	i. Internal communications plan – staff and members. Include communications toolkit. Look at how WFG embedded within organisation.	Dec 23

<i>Regularly publicise progress and achievements to embed aspirations to be net zero carbon by 2030</i>	ii. External communications plan. Include communications toolkit.	Dec 23
	iii. Undertake an audit within schools to create an overview of what is currently happening within schools and use the findings to inform future professional learning and resources.	Jul 23
	iv. Capture Case Studies and examples of work taking place in school in order to share practice.	Dec 23
	v. To further promote the work of Newport City through promoting school based workshops on offer and adding Climate Change to the school calendar of days to acknowledge. Also promote other relevant resources to schools.	Mar 24
	vi. Work with other internal groups to spread climate change links, e.g. strategic equalities and Welsh language. Carry out mapping exercise to see where links could be made.	Sep 23
	4. Financial Commitment: <i>To plan for the financial impacts of climate change, and to ensure that our medium to long term financial planning contributes to the delivery of the Council's commitment to reduce carbon emissions where possible.</i>	i. Framework for investment in Climate Change
	ii. Embed ESG principles into investments and pensions	Mar 24
	iii. Review finance templates and forms to ensure that climate change is included where relevant	Sep 23

7.2 Our Buildings

Priority Area	Action	Date
1. New Council Buildings: <i>All new buildings will be net zero carbon.</i>	i. Adopt and adhere to New Build policy	June 23
	ii. Ensure capital costs for Net Zero Carbon buildings are met	Mar 24
	iii. The next NCC new build project initiated to be Net Zero Carbon in construction (embodied carbon) as well as operational energy as a test case	Mar 24
	iv. Quantify carbon impact of new builds and street lighting added since our carbon reporting baseline year and examine if this data could be used to project future emissions.	June 23

<p>2. Building Retrofitting: <i>Deep retrofit to create net zero carbon energy buildings.</i></p>	i. Write and adopt a policy statement and approach for building retrofit	Sep 23
	ii. Low Carbon Heating – Move from fossil fuelled heating to low carbon heating on a further 5 buildings	Mar 24
	iii. Identify priority list of assets for retrofitting. (partially dependant on 3. i)	Sep 23
	iv. Undertake retrofit surveys in line with PAS 2038 to inform the optimised retrofit approach on 20 buildings. (partially dependant on 2.iii)	Mar 24
	v. Increase our installed PV capacity to 3MW	Mar 24
	vi. Retrofit 3 battery storage systems within our estate and a pilot project to inform future roll out	Mar 24
<p>3. Building Rationalisation: <i>Audit current assets to understand their long-term carbon impact with the aim of better strategic utilisation.</i></p>	i. Produce cost estimate for decarbonisation of the estate	June 23
	ii. Support development of Asset Rationalisation Programme Board and associated Project Boards to ensure that Climate Change is represented at appropriate levels	Mar 24
	iii. Ensure that review of SAM Plan includes appropriate climate/decarbonisation elements	Dec 23
<p>4. Operational Energy: <i>Reduce the use of energy across our estate in ways that do not require capital expenditure</i></p>	i. Draft and adopt an operational energy policy	Sep 24
	ii. Develop and issue quarterly comparative energy and cost reporting for key buildings and services – report exceptions	Sep 23
	iii. Schools – add energy usage to agendas for next business manager and cluster meetings to discuss energy usage	June 23
	iv. Schools – explore funding options to get all sites signed up to Energy Sparks	Sep 23

	v. Complete implementation of energy mitigation project (monitored by DMT)	Mar 24
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7.3 Our Land

<i>Priority Area</i>	Action	Date
1. Land Portfolio: <i>Audit current assets to understand their long-term potential carbon impact with the aim of better strategic utilisation.</i>	i. Support development of Asset Rationalisation Programme Board and associated Project Boards to ensure that Climate Change is represented at appropriate levels	n/a
	ii. Create accurate land ownership data base for use in this project – amendments to freehold base layer which has only 95% accuracy.	August 2023
2. Ecosystem Resilience: <i>Sustainably restore, create and connect biodiversity and habitats by improving Council owned land and public realm</i>	i. Working group to establish carbon / climate / bio-diversity enhancement potential of our owned land (links to 1.i)	April 2023
	ii. Mapping overlays of Green Infrastructure Assessment onto accurate NCC ownership data base created in (1.iii) to identify significant GI	December 2023
	iii. Create a standardised management plan format for all NCC land in ownership and management to identify opportunity for tree planting	December 2023
	iv. Biodiversity and development SPG to be reviewed and revised to cover works taking place over next 3 years and until the publication of the RLDP	Mar 2024
	v. Produce interim (annual) review of Section 6 report	Mar 2024
3. Trees & Woodland: <i>Improve human health, environmental quality, carbon reduction and capture by sustainably managing and increasing Newport's trees and woodland.</i>	i. Plant 5,000 trees per year	Mar 2024
	ii. Baseline data of tree canopy cover to be reviewed and recalculated using accurate aerial information	December 2023
	iii. Urban Tree Strategy completed and published	December 2023

	iv. NCC tree policy reviewed, updated and published and NCC website revised and updated	October 2023
	v. Undertake ward by ward assessment of the 'other' land in ownership to identify tree planting opportunities, verges, pockets and in other control.	December 2023
4. Urban Greenspace: <i>Increase green infrastructure in the urban/public realm to reduce environmental inequalities, for the multiple benefits of nature's recovery, human health and wellbeing, climate adaptation, cooling and flood alleviation, providing carbon reduction and clean air.</i>	i. Green infrastructure – improvements to city centre public realm through introduction of green infrastructure at five locations	December 2023
	ii. Pocket parks – development and design detail of three pocket park sites from green infrastructure assessment	Mar 2024
	iii. Wildflower/tree planting – maintenance of Bee Friendly pollinator sites to aid carbon capture	August 2024
	iv. SUDs – further SUDs schemes completed in city centre	October 2023
5. Flooding <i>Build climate resilience and alleviate flooding across the city using a range of measures including natural flood defences.</i>	i. Develop a sustainable drainage strategy for Newport and maximise opportunities for SuDS.	June 2023
	ii. Update flood risk management plan and strategy in line with national strategy.	Mar 2024
	iii. Apply for Welsh Government grant funding for schemes as it becomes available	Mar 2024
	iv. Investigate any problems with existing assets and update the flood asset databases	Mar 2024

7.4 Transport and Mobility

Priority Area	Action	Date
1. Business (Grey) Mileage & Staff Commuting: Reduce carbon emissions from employee commuting and grey mileage by implementing a policy of agile working, active travel and usage of public transport and ultra-low emissions vehicles (ULEVs).	i. Reduce commuting by single use car by implementing new initiatives and behavioural change	Mar 2024
	ii. Increase participation in active travel including cycling, walking and use of public transport	Mar 2024
	iii. Develop and implement sustainable travel plans for key Council sites, including schools (potential for help from Sustrans)	Mar 2024
	iv. Provide manual and electric bikes for staff to undertake site visits and inspections as part of Council fleet – potential link to city-wide cycle hire scheme through Burns	Mar 2024
	v. Undertake staff survey to understand commuting and travel behaviour	June 23
2. Fleet: Reduce Council carbon emissions by moving to a ULEV fleet.	i. Produce fleet replacement plan and cost of transition to fully ULEV fleet	Mar 2024
	ii. Begin reporting on number of electric miles driven vs conventional miles and the benefits resulting from this	Mar 2024
	iii. Produce a plan for electrifying remaining 11 diesel vans	Mar 2024
	iv. Operate at least 1 electric sweeper	Mar 2024
3. Charging Point Infrastructure: Increase charging capacity across council sites.	i. Implement fleet charging at Civic Centre	Mar 2024
	ii. Ensure all schools that have or are visited by NCC fleet vehicles either have charging point infrastructure installed or a plan in place for installation	Mar 2024
	iii. Establish a process for allowing staff to pay for the use of Fleet chargers	Mar 2024

	iv. Undertake an estate review to find locations where resident charging could be installed	Dec 2023
	v. Include EV charging guidance in specification for NCC construction projects	Dec 2023

7.5 The Goods and Services we Procure

Priority Area	Action	Date
1. Base Existing Supply Chain <i>A one-off exercise to establish our supply chain emission for a baseline year (21/22 or 22/23) depending on the availability of data.</i>	i. Baseline the emissions for the top 50% of our spend for 22/23 (47 suppliers).	Aug 2023
	ii. Develop educational materials for all existing suppliers on carbon reduction and supporting NCC on achieving NZC by 2030.	Aug 2023
	iii. Develop and issue a toolkit for suppliers to provide data for 22/23 and for 23/24.	Aug 2023
	iv. Baseline emissions for the bottom 50% of our spend for 22/23.	Aug 2023
2. Measurement and targeting <i>Develop processes to support NCC staff and suppliers to measure and reduce supply chain emissions for 23/24 and into the future.</i>	i. Develop a measurement tool to give more detailed information of the areas of focus.	Aug 2023
	ii. Engage with strategic suppliers to seek out carbon reduction opportunities during the lifetime of contracts.	Aug 2023
3. Organisational Processes for Procurement <i>Develop and implement process to reduce the carbon intensity of each procurement the council makes. .</i>	i. Develop documentation and processes to support implementation of decarbonisation processes currently integrated into Gateway Level 4 into all Gateway Level 3 procurements.	May 23
	ii. Develop on decarbonisation-specific sections of tender and gateway process documentation to embed measurement tool detailed in 2. above.	Mar 2024
	iii. Explore implications of extending decarbonisations processes into Gateway Level 2	Mar 2024

4. Social Services <i>Social care spend represents X% of our annual spend and X% of our emission. WG have a specific focus on SC decarbonisation which NCC will replicate.</i>	i. Roll out the reporting toolkit to NCC’s social care providers.	Aug 2023
	ii. Undertake decarbonisation audits of all commissioned and non-commissioned care homes and fleets to give guidance on where carbon and financial savings can be made.	Mar 2024

7.6 Our Wider Role

Priority Area	Action	Date
1. Waste: <i>Reduce carbon emissions from managing waste to become a zero-waste city and nation by 2050.</i>	i. Increase recycling rate to 70%	Mar 24
	ii. Include additional climate change/decarbonisation actions in revised Waste Strategy	Mar 24
	iii. Identify solutions to increase the number of eRCVs in our fleet	Mar 24
	iv. Trial project to work with Newport City Homes to incentivise increased recycling rate for households	Mar 24
	v. Implement The Environmental Protection (Single-use Plastic Products) (Wales) Bill to remove single use plastics from our estate and work to remove single use plastics from our supply chain	Mar 24
	vi. Implement a system to more accurately record waste collected from NCC sites.	Mar 24

8 APPENDIX C - GLOSSARY OF TERMS

Biodiversity is all the different kinds of life you'll find in one area—the variety of animals, plants, fungi, and microorganisms like bacteria that make up our natural world. Each of these species and organisms work together to maintain balance and support life.

Building Retrofit is changes to a building after construction to improve energy efficiency or decrease energy demand.

Carbon Literacy is an awareness of the carbon dioxide costs and impacts of everyday activities, and the ability and motivation to reduce emissions, on an individual, community and organisational basis.

Carbon Neutral is a state of net zero carbon emissions.

Carbon Sequestration is the process of capturing and storing atmospheric carbon dioxide. It is one method of reducing the amount of carbon dioxide in the atmosphere with the goal of reducing global climate change. Forests and other forms of plant life absorb carbon dioxide from the air as they grow and bind it into biomass.

A **Circular Economy** is achieved by designing products smartly with their whole life cycle in mind, re-using and repairing to extend their useful life, and then when their life is deemed over, remanufacturing to create new products from old.

Climate Change includes global warming and the “side effects” of warming, e.g. melting glaciers, heavier rainstorms, more frequent drought.

Climate Change Mitigation means avoiding and reducing greenhouse gas emissions and increasing greenhouse gas capture and storage.

Climate Change Adaptation is altering our behaviour and way of life to protect our families, our economies, and the environment in which we live from the impacts of climate change.

The **Climate Emergency** is a situation in which urgent action is required to reduce or halt climate change and avoid potentially irreversible environmental damage resulting from it.

Deep Retrofitting is a major or whole building retrofit to achieve a near net-zero energy building

Ecology is the relationship between living things and their environment.

Ecosystems are all the living things in an area and the way they affect each other and the environment.

Ecosystem Resilience is the capacity of an ecosystem to respond to a disturbance by resisting damage and recovering quickly.

Global Warming is the Earth’s rising surface temperature and is one symptom of the much larger problem of human-caused climate change.

The **Greenhouse Effect** is a warming of Earth’s surface caused by greenhouse gases.

Greenhouse gases (GHG) are the thin layer of gases surrounding the Earth. These gases include both naturally occurring and human-derived greenhouse gas such as carbon dioxide, methane, water vapour and nitrous oxide.

Green Infrastructure is a network of multi-functional green space and green features, which can deliver quality of life and environmental benefits for communities. It includes parks, open spaces, playing fields, woodlands, street trees, allotments, private gardens, green roofs and walls, SuDS and soils.

Natural Resources are natural assets or raw materials occurring in nature. Earth's natural resources include light, air, water, plants, animals, soil, stone, minerals, and fossil fuels.

Nature-Based Solutions are actions to protect, sustainably manage, and restore natural and modified ecosystems that address societal challenges effectively and adaptively, simultaneously providing human well-being and biodiversity benefits.

Net Zero is achieving a balance between the amount of greenhouse gas emissions produced and the amount removed.

Procurement is the act of purchasing goods or services.

Scope 1 Direct Emissions arise from sources that are owned or controlled by the council including emissions from our plant and vehicle fleet and fuel.

Scope 2 Indirect Emissions arise from the generation of purchased electricity and heating. The energy is generated elsewhere, however as a user the council is responsible for these emissions.

Scope 3 Indirect Emissions arise from sources that are not owned and not directly controlled

by the council; however, they are related to our activities. This includes emissions from the supply chain, such as goods we have purchased and services that we have outsourced. It also includes emissions from the water we consume, our waste services, employee commuting and business travel.

Solar PV (Solar Photovoltaics) is the generation of electricity using energy from the sun. Modern solar panels produce electricity from daylight and do not require direct sunlight, although more electricity is produced on bright sunny days.

Sustainable Drainage Systems (SuDS) are designed to manage stormwater locally, to mimic natural drainage and encourage its infiltration and passive treatment. SuDS are designed to both manage the flood and pollution risks resulting from urban runoff and to contribute wherever possible to environmental enhancement and place-making.

Sustainable Procurement is a process whereby organisations meet their needs for goods, services and works in a way that achieves value for money on a whole life basis and generates benefits not only to the organisation, but also to society, the economy and the environment. It considers the social, economic and

environmental consequences of what is procured through all stages of its life cycle. This includes considering design, resource extraction and sourcing, manufacturing and production, transportation, service delivery, operation and maintenance, reuse, recycling and disposal. It is also about questioning whether the purchase requires to be made at all. It also considers the capacity of suppliers to address these consequences throughout the entire supply chain.

Sustainable Transport Options are walking, cycling, public transport and electric vehicles. Not all options are equally sustainable.

Tonnes of Carbon Dioxide Equivalent (tCO₂e) is a measure used to compare the emissions from various greenhouse gases based upon their global warming potential. For example, the global warming potential for methane over 100 years is 21. This means that one million metric tons of methane emissions is equivalent to 21 million metric tons of carbon dioxide.

Ultra-Low Emission Vehicles (ULEVs) are vehicles that emit less than 75g of CO₂ per km from the exhaust

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Report

Cabinet

Part 1

Date: 13 September 2023

Subject **Newport City Council response to external pressures impacting Council services.**

Purpose To present an update to Cabinet on the external pressures impacting on the delivery of Council services, and a summary of Newport City Council's response.

Author Policy and Partnership Manager

Ward All Wards

Summary This report provides an update on the external pressures facing the council with the cost-of-living crisis continuing to be the main external pressure faced by our residents, communities, and services during this month.

Collaboration and partnership working is key to supporting our citizens and therefore this report provides information on how this way of working is enabling a greater access for our residents to support, advice, and guidance.

Proposal Cabinet to consider the contents of the report on the Council's activity to respond to the external factors on Newport's communities, businesses, and council services.

Action by Executive Board and Corporate Management Team

Timetable Immediate

This report was prepared after consultation with:

- Head of Prevention and Inclusion
- Head of Housing and Communities
- Deputy Head of Education
- Head of Finance
- Head of Law and Standards
- Head of People, Policy, and Transformation

Signed

Background

This report is presented monthly to Cabinet members to highlight the key pressures facing our communities, businesses, and council services, and to provide an update on how we are working collaboratively with our partners to help support those in need.

The main pressures highlighted in this month's report are related to the ongoing cost-of-living crisis and housing and homelessness.

Cost of Living Crisis

Despite inflation in the UK dropping for the second month, it remains high overall and above the Bank of England's target rate. There are early reports that as a result, the Bank of England is expected to raise interest rates again next month in an effort to bring inflation down¹, which could increase monthly costs for those with mortgage and other borrowing costs.

In addition, consumer reports indicate further price rises such as petrol, which may lead to increased household costs for residents.

Members will also be aware that all UK and Welsh Government cost of living related schemes have now ended, and no announcement has been made regarding future schemes for 2023-24 to date.

Officers from across the council and our partner agencies continue to work together to help mitigate the impact locally, and we have been able to fund two dedicated cost of living advisors to coordinate and promote support, advice and guidance with partners and residents across Newport via UK Shared Prosperity Funding and these posts are being recruited to. To raise awareness amongst all officers of the impact of poverty upon children and young people and the support available, colleagues in our education department delivered an awareness session on the impact of poverty as part of staff training day.

Free and low-cost summer events have been supported and facilitated through July and August as an opportunity to engage with families as this has proved to be more useful to residents than dedicated cost of living events and provides further opportunity to disseminate the cost-of-living directory, which is updated monthly, and to provide practical supporting including free period products and pre-loved school uniforms. Events have been scheduled for autumn and winter to ensure residents are able to access support during the colder weather.

Newport City Council provided additional financial and practical support to our communities over the school holidays to help tackle food poverty during the period, working in partnership with GAVO and Newport Live on summer initiatives with free lunches, additional support via foodbanks, and providing supermarket vouchers to approximately 1,000 of our most vulnerable households.

Homelessness and Financial Resilience

Pressures on housing and homelessness services in the city continue to be very high. This is caused by a range of factors including the impact of the cost-of-living crisis on household finances and high rents within the private rented sectors.

These high rents are in the context of the current maximum amount of Local Housing Allowance (LHA) that can be claimed by residents in private rented accommodation via housing benefit or universal credit (housing costs) being £113.92 per week for a 2 bed roomed house compared to the average market rents of £219 (median) and £310 (mean). Previously the LHA equated to the 30th percentile of the market rent, meaning that 3 in 10 properties would be affordable and accessible for people on low incomes in receipt of benefits, however the LHA rate has been frozen nationally since March 2020 while rent rates in Newport have continued to rise. [Research](#) published by the Bevan Foundation in March 2023 found only 1.2% of the properties advertised were advertised at rents that were at or below LHA

¹ <https://www.bbc.co.uk/news/live/business-66502810/page/3>

rates, compared to 5.9% in August 2022. None of the properties they researched in Newport were able to be fully covered by the LHA.

The LHA freeze has a dual impact causing landlords to evict people and then preventing people from securing alternative accommodation in the private rented sector. It is a significant contributory cause of the homelessness crisis in Newport, Wales, and the UK more generally.

In addition, there is a continued challenge in the city with developing new housing projects, and the council is working hard in partnership with Housing Associations, through the recently released Welsh Government Transitional Accommodation Program (TACP), to increase its success in preventing homelessness and to maximise the new homes it can provide.

Ukrainian Support Scheme

The use of one of Newport's hotels which being used by the Welsh Government "Super Sponsor Scheme" will cease in November 2023. The council's Connected Communities Team is working with residents and colleagues from Welsh Government to identify suitable move on options for these households. Recent additional funding from the Welsh Government has also allowed NCC to continue to provide 2 educational hubs for Ukrainian students.

Risks

Risk Title / Description	Risk Impact score of Risk if it occurs* (1-5)	Risk Probability of risk occurring (1-5)	Risk Mitigation Action(s) What is the Council doing or what has it done to avoid the risk or reduce its effect?	Risk Owner Officer(s) responsible for dealing with the risk?
Cost of Living impact on Council services	4	4	See this report on the Council's response to the cost-of-living crisis.	Corporate Management Team
Homelessness and housing concerns across the city.	4	2	See this Report on the Council's response to these issues	Corporate Management Team, Head of Housing and Communities, Director of Social Services

* Taking account of proposed mitigation measures

Links to Council Policies and Priorities

- Corporate Plan
- Strategic Equalities Plan

Options Available and considered.

1. To consider and note the contents of the report on the Council's response.
2. To request further information or reject the contents of the report.

Preferred Option and Why

1. To consider and note the contents of the report on the Council's response.

Comments of Chief Financial Officer

The report highlights examples of support which is available to citizens who are struggling with the cost-of-living crisis. Whilst a significant amount of this specific support is funded from UK Government and Welsh Government, certain factors are having an impact on the Council's finances, both in the short term

and across the medium-term. Evidence of this can be seen via the financial pressures upon the Housing & Communities budget, driven by the high levels of homelessness in the city.

Specific examples within the report give rise to potential cost implications. An example of this is the recruitment of two cost of living advisors. Whilst these posts are currently funded via the Shared Prosperity Fund (a UK Government grant funded programme), this funding is time limited, meaning these posts can only be in place whilst that funding is available. Should there be a need or desire to extend these posts beyond that window, the funding will either need to be found from within existing resources or a new pressure will have to be added to the Council's medium term financial plan.

A second example is the Transitional Accommodation Capital Programme. The financial implications of this are not currently clear, and it is assumed that the costs will either be met by partners or via grant funding. Should this not be the case, it is important that the Council is not exposed to additional costs, and where that is the case, appropriate funding for these costs must be identified before anything is committed to.

More generally, and especially in the context of an extremely challenging medium-term horizon, budget managers and Heads of Service will be expected to continue to monitor the impact of the external factors included in this report, especially in areas where grant funding ends, and work with Finance colleagues to escalate any material financial implications and report them where relevant. This will need to also include plans to mitigate any issues, as far as is possible.

Comments of Monitoring Officer

There are no legal issues arising from the report. Any specific legal implications will be addressed as part of the Council's operational responses to the key issues identified in the report.

Comments of Head of People, Policy, and Transformation

Both the cost-of-living crisis and the housing situation in Newport continue to affect our residents and staff and this report provides examples of how we are working with partners across the city to provide advice, support, and guidance to those most at need. In line with the WBFG Act there is a focus both on providing short term support and long-term resilience. This can also be seen in our collaboration in increase affordable housing now and thinking longer term.

The council is continuing to consider HR implications for our workforce and working with all service areas closely during this period.

Scrutiny Committees

Not applicable as this an information only report and no decision is required from the Council.

Fairness and Equality Impact Assessment:

Not applicable as this is an information only report and no decision is required.

• Wellbeing of Future Generation (Wales) Act

Long Term – The short term actions the Council is taking now is considering the longer-term impacts which the cost of living is having on communities and businesses in Newport. Newport Council alongside partners are providing financial and non-financial support to help households and businesses.

Collaborative – Newport Council is working collaboratively across the organisation and our external public, private, third sector, voluntary, and housing sectors.

Integration – The actions that the Council and is taking supports the Council's organisational priorities for community cohesion, early intervention, and prevention. This also supports the Welsh Government's priority for Wales being a nation of sanctuary.

Involvement – We are involving communities and residents who are providing vital front-line support and helping vulnerable / disadvantage households, and refugees. The Council is also providing regular updates and communications to those impacted by the cost-of-living crisis.

Prevention - The short term actions the Council is taking now is considering the longer-term impacts which the cost of living is having on communities and businesses in Newport. Newport Council alongside partners are providing financial and non-financial support to help households and businesses.

- **Equality Act 2010**

Consideration of protected characteristics as detailed within the Equality Act has informed the activities and support provided.

- **Socio-economic Duty**

The support being provided is fully congruent with the requirements of the socio-economic duty.

- **Welsh Language (Wales) Measure 2011**

All information is provided bilingually.

Consultation

Not applicable

Background Papers

Monthly reports to Cabinet.

Dated: 5 September 2023

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One Newport Partnership – Summary of Business

One Newport Partnership Meeting: 4th July 2023

This is a summary of the work of One Newport Partnership at its July 2023 meeting.

The full agenda can be found [here](#). The Partnership met online.

Marmot Report Findings

Members received a presentation on the main findings and recommendations from the Marmot Report 'Building a Fairer Gwent: Improving Health Equity and the Social Determinants'.

The final report is being presented to the Gwent Public Services Board (PSB) on the 20 July 2023 for discussion and formal publication.

Gwent Well-being Plan Update

The Gwent Well-being Plan is expected to be signed off by Gwent PSB on the 20 July 2023. In the meantime, One Newport is continuing to develop its Local Action Plan, which will contribute to the delivery of Gwent PSB's Well-being Objectives at a local level and deliver other strategic partnership activity in Newport.

Newport Local Action Plan Consultation Draft

Members approved the consultation draft of the local action plan and agreed the consultation approach.

The draft themes and actions were informed through engagement work already undertaken via the Gwent Well-being Plan (well-being assessment) along with two further workshops with local stakeholder organisations. A public consultation on the draft is planned for Aug/Sept 2023 to seek the views of residents and stakeholders.

One Newport will sign off the final local action plan at their December meeting.

Shared Prosperity Fund

An update on the Shared Prosperity Fund and local investment plan was provided to members, which can be [accessed here](#).

The local investment plan is split into three areas: Communities & Place; Supporting Local Business; and People & Skills. With an additional project called 'Multiply' (UK government funded programme to help adults improve their numeracy skills).

The focus areas were developed using public consultation and sits below a more strategic regional investment plan.

One Newport Partnership Meetings and Papers

One Newport publishes its meeting papers and minutes online. Papers, including those of the former One Newport Public Services Board, are [here](#).

Gwent PSB papers and minutes are available [here](#).

Latest News - One Newport Bulletin

One Newport issues a regular [bulletin](#) outlining initiatives, activities and events organised by partners across the city.

Get Involved – Newport Citizen’s Panel

One Newport welcomes the views of local people. One way to get involved is to join our Citizen’s Panel and give us your opinions through quarterly questionnaires on issues, services, and projects in the city. Find out more [here](#).

Contact

One Newport Information

Twitter: [@onewport](#) / Instagram: [onewport](#)

Website: www.newport.gov.uk/oneNewport

Gwent PSB Information

Website: www.gwentpsb.org/

Twitter: [@GwentPSB](#) / Instagram: [GwentPSB](#)

Report

Cabinet

Part 1

Date: 13 September 2023

Subject Cabinet Work Programme

Purpose To report and agree the details of the Cabinet's Work Programme.

Author Governance Team Leader

Ward All Wards

Summary The purpose of a work programme is to enable Cabinet to organise and prioritise the reports and decisions that are brought to each meeting. Effective forward planning by Cabinet also impacts positively upon the Council's other Committees, in particular Scrutiny, because work needs to be coordinated on certain reports to ensure proper consultation takes place before a decision is taken.

The current work programme runs to May 2024, but it is a working document. It is important that the work programme is owned and prioritised by Cabinet Members directly, so each month the Governance Team Leader brings a report updating Cabinet on any changes, so that the revised programme can be formally approved.

The updated work programme is attached at Appendix 1.

Proposal To agree the updated work programme for 2023/24

Action by Governance Team Leader

Timetable Immediate

This report was prepared after consultation with:

- Chief Officers
- Monitoring Officer
- Head of Finance
- Head of People, Policy and Transformation

Background

The purpose of a work programme is to enable Cabinet to organise and prioritise the reports and decisions that are brought to each meeting. Effective forward planning by Cabinet also impacts positively upon the Council's other Committees, in particular Scrutiny, because work needs to be coordinated on certain reports to ensure proper consultation takes place before a decision is taken.

The Wales Audit Office's Corporate Assessment of Newport City Council, published in September 2013, highlighted the need to "strengthen committee work programming arrangements to ensure they are timely, meaningful, informative, transparent, balanced, monitored, and joined up". Since that report was published, these monthly reports have been introduced to provide Cabinet with regular updates on its work programme, and the opportunity to comment upon and shape its priorities as an executive group. The Democratic Services team have also been working to improve the links between this and other work programmes under its management (eg Council, Scrutiny, Audit) to ensure the various programmes are properly coordinated.

The current work programme runs to May 2024, but it is a working document. It is important that the work programme is owned and prioritised by Cabinet Members directly, so each month the Cabinet Office Manager brings a report updating Cabinet on any changes, so that the revised programme can be formally approved.

The updated work programme is attached at Appendix 1.

Financial Summary

There is no direct cost to adopting a programme of work.

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?
No action taken	M	L	Work programming arrangements are in place to ensure they are timely, meaningful, informative, and transparent, balanced, monitored, and joined up.	Head of Democratic Services
The process is not embraced by report authors and members	M	M	If there is proliferation of unplanned or late items, the opportunity to ensure work programming is timely, meaningful, informative, and transparent, balanced, monitored, and joined up will diminish	Head of Democratic Services

Links to Council Policies and Priorities

These proposals will help the Council provide the best possible service to members and will provide information to the public and elected members.

Options Available and considered

- To adopt the process and adopt or amend the work programme
- To consider any alternative proposals raised by Cabinet members
- To take no action

Preferred Option and Why

To adopt the proposals which should help to ensure work programming arrangements are timely, meaningful, informative, and transparent, balanced, monitored, and joined up.

Comments of Chief Financial Officer

There are no financial implications in adopting a programme of work.

Comments of Monitoring Officer

There are no legal implications in adopting a programme of work.

Comments of Head of People, Policy and Transformation

There are no specific HR implications in adopting a programme of work. The principles of open and transparent governance are consistent with the Council's Corporate Plan and objectives under the Well-being of Future Generations (Wales) Act.

Local issues

There are no local issues as this report relates to the Council's processes.

Scrutiny Committees

Monthly update reports allow the Scrutiny and Cabinet work programmes to be better coordinated. The Scrutiny team and Members are currently developing new ways of working through the new Committees, and continually reviewing the work programmes to focus more on risk and ensure all scrutiny activity has a defined purpose and constructive outcome.

Equalities Impact Assessment and the Equalities Act 2010

This does not apply to this procedural report.

Children and Families (Wales) Measure

This procedural report does not impact on Children and Young People although certain reports contained in the programme may do and will need appropriate consultation and comment when they are presented to cabinet.

Wellbeing of Future Generations (Wales) Act 2015

This is a procedural report but reports contained within the programme will need to show how consideration has been given to the five things public bodies need to think about to show they have applied the sustainable development principle put into place by the Act.

Consultation

As set out above

Background Papers

Dated: August 2023

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Cabinet

Work Programme: June 2023 to May 2024

Meeting	Agenda Items	Lead Officer
Cabinet 14/06/23	<ul style="list-style-type: none"> ▪ Director of Social Services Annual Report ▪ Annual Safeguarding Report ▪ 2022/23 Treasury Management Year End Report ▪ NCC External Pressures - Cost of Living ▪ One Newport Summary Document (for information/ awareness) ▪ Work Programme 	<ul style="list-style-type: none"> ▪ CD: SS ▪ CD: SS ▪ HoF ▪ CX/HPP&T ▪ HPP&T ▪ GTL
Cabinet 12/07/23	<ul style="list-style-type: none"> ▪ 2022/23 Revenue Budget Outturn ▪ 2022/23 Capital Outturn and Additions ▪ Welsh Language Annual Report ▪ Corporate Risk Register Update (Q4) ▪ NCC External Pressures - Cost of Living ▪ Work Programme 	<ul style="list-style-type: none"> ▪ HoF ▪ HoF ▪ HPP&T ▪ HPP&T ▪ CX/HPP&T ▪ GTL
Council 18/07/23	<ul style="list-style-type: none"> ▪ Council Appointments ▪ 2022/23 Treasury Management Year End Report ▪ Welsh Language Annual Report ▪ Director of Social Services Annual Report ▪ Annual Safeguarding Report ▪ IRP Annual Report ▪ Review of Standing Orders 	<ul style="list-style-type: none"> ▪ GTL ▪ HoF ▪ HPP&T ▪ CD: SS ▪ CD: SS ▪ HL&S ▪ HL&S
Cabinet 13/09/23	<ul style="list-style-type: none"> ▪ Revenue Budget Monitor ▪ Capital Budget Monitor ▪ Replacement Local Development Plan ▪ Demolition of Millbrook Primary School ▪ Corporate Risk Register Update (Quarter 1) ▪ Climate Change Annual Report ▪ NCC External Pressures - Cost of Living ▪ One Newport Summary of Business ▪ Work Programme 	<ul style="list-style-type: none"> ▪ HoF ▪ HoF ▪ HR&ED ▪ CEo ▪ HPP&T ▪ HE&PP ▪ CX/HPP&T ▪ HPP&T ▪ GTL
Council 26/09/23	<ul style="list-style-type: none"> ▪ Council Appointments ▪ Replacement Local Development Plan ▪ Climate Change Annual Report ▪ Market Arcade PSPO ▪ Maesglas PSPO ▪ Scrutiny Arrangements and Additional Meeting of CJC 	<ul style="list-style-type: none"> ▪ GTL ▪ HR&ED ▪ HPP&T ▪ HE&PP ▪ HE&PP ▪ HL&S
Cabinet	<ul style="list-style-type: none"> ▪ Capped Nine (KS4 School Outcomes) 	<ul style="list-style-type: none"> ▪ CEo

18/10/23	<ul style="list-style-type: none"> ▪ RPB Report ▪ Corporate Plan 2022/27 Annual Report (Annual Corporate Wellbeing Self-Assessment included) ▪ Strategic Equality Plan Annual Report ▪ NCC External Pressures - Cost of Living ▪ One Newport Summary Document (for information/ awareness) ▪ Work Programme 	<ul style="list-style-type: none"> ▪ CD: SS ▪ HPP&T ▪ HPP&T ▪ HPP&T ▪ HPP&T ▪ GTL
Cabinet 15/11/23	<ul style="list-style-type: none"> ▪ Revenue Budget Monitor ▪ Capitol Monitor ▪ Treasury Management Half Yearly Monitoring Report ▪ Annual Safeguarding Report ▪ Annual Compliments, Comments and Complaints ▪ NCC External Pressures - Cost of Living ▪ Work Programme 	<ul style="list-style-type: none"> ▪ HoF ▪ HoF ▪ HoF ▪ CD: SS ▪ HPP&T ▪ CX/HPP&T ▪ GTL
Council 28/11/23	<ul style="list-style-type: none"> ▪ Council Appointments ▪ Treasury Management Half Yearly Monitoring Report ▪ Strategic Equality Plan Annual Report ▪ Corporate Plan 2022/27 Annual Report ▪ Climate Change Plan Annual Report ▪ RPB Market Stability Report ▪ Democratic Services Annual Report ▪ Standards Committee Annual Report 	<ul style="list-style-type: none"> ▪ GTL ▪ HoF ▪ HPP&T ▪ HPP&T ▪ SD: E&S/HE&PP ▪ CD: SS ▪ HL&S ▪ HL&S
Cabinet 13/12/23	<ul style="list-style-type: none"> ▪ 2024/25 Revenue Draft Budget and MTFP: Final Proposals ▪ Corporate Risk Register Update (Quarter 2) ▪ NCC External Pressures - Cost of Living ▪ Work Programme 	<ul style="list-style-type: none"> ▪ HoF ▪ HPP&T ▪ CX/HPP&T ▪ GTL
Cabinet 10/01/24	<ul style="list-style-type: none"> ▪ Revenue Budget Monitor ▪ Capitol Monitor ▪ Western Gateway ▪ Mid-Year Performance Update ▪ NCC External Pressures - Cost of Living ▪ One Newport Summary Document (for information/ awareness) ▪ Work Programme 	<ul style="list-style-type: none"> ▪ HoF ▪ HoF ▪ HR&ED ▪ HPP&T ▪ CX/HPP&T ▪ HPP&T ▪ GTL
Council 23/01/23	<ul style="list-style-type: none"> ▪ Council Appointments ▪ Council Tax Reduction Scheme ▪ Schedule of Meetings 2024/25 ▪ Mayoral Nomination 2024/25 	<ul style="list-style-type: none"> ▪ GTL ▪ HoF ▪ GTL ▪ GTL
Cabinet 14/02/24	<ul style="list-style-type: none"> ▪ 2024/25 Capital Strategy and Treasury Management Strategy ▪ 2024/25 Revenue Budget and MTFP: Final Proposals ▪ NCC External Pressures - Cost of Living ▪ Work Programme 	<ul style="list-style-type: none"> ▪ HoF ▪ HoF ▪ CX/HPP&T ▪ GTL

Council 27/02/24	<u>Budget:</u> <ul style="list-style-type: none"> ▪ Council Appointments ▪ 2024/25 Council Tax and Budget ▪ 2024/25 Capital Strategy and Treasury Management Strategy ▪ National Non-Domestic Rates: Discretionary Relief: High Street Relief Scheme 2024/25 ▪ Gwent Wellbeing Plan 	<ul style="list-style-type: none"> ▪ GTL ▪ HoF ▪ HoF ▪ HoF ▪ HPP&T
Cabinet 13/03/24	<ul style="list-style-type: none"> ▪ Corporate Risk Register Update (Quarter 3) ▪ Pay and Reward Statement 2024/25 ▪ EAS Business Plan ▪ NCC External Pressures - Cost of Living ▪ Work Programme 	<ul style="list-style-type: none"> ▪ HPP&T ▪ HPP&T ▪ CEdO ▪ CX/HPP&T ▪ GTL
Cabinet 10/04/23	<ul style="list-style-type: none"> ▪ Annual Corporate Safeguarding Report ▪ NCC External Pressures - Cost of Living ▪ One Newport Summary Document (for information/ awareness) ▪ Work Programme 	<ul style="list-style-type: none"> ▪ HCS ▪ CX/HPP&T ▪ HPP&T ▪ GTL
Council 23/04/24	<ul style="list-style-type: none"> ▪ Council Appointments ▪ IRP Annual Report ▪ Pay and Reward Statement 	<ul style="list-style-type: none"> ▪ GTL ▪ HL&S ▪ HPP&T
Cabinet 15/05/24	<ul style="list-style-type: none"> ▪ NCC External Pressures - Cost of Living ▪ Digital Strategy – Annual Report ▪ Work Programme 	<ul style="list-style-type: none"> ▪ CX/HPP&T ▪ HPP&T ▪ GTL
Council 07/05/24	<u>AGM:</u> <ul style="list-style-type: none"> ▪ Council Appointments 	<ul style="list-style-type: none"> ▪ GTL

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